Doc. 68 Att. 8

Fleming, et al. v. COP, et al. No. CV04-2338 RSM

DECLARATION OF MARCUS B. NASH IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

EXHIBIT G

		Page 1
1	UNITED STATES DISTRICT	COURT
2	WESTERN DISTRICT OF WA	SHINGTON (O) On ~
3	AT SEATTLE	
4		
)
5	KENNETH FLEMING and JOHN DOE,)
)
6	Plaintiffs,)
-	370) NO. 04-2338 RSM
7	vs.)
8	THE CORPORATION OF THE PRESIDENT OF THE)
	CHURCH OF JESUS CHRIST OF LATTER-DAY)
9	SAINTS, a Utah corporation sole, a/k/a)
	"MORMON CHURCH"; LDS SOCIAL SERVICES)
10	a/k/a LDS FAMILY SERVICES, a Utah)
	corporation,)
11)
***	Defendant.)
12		
13	DEPOSITION UPON ORAL EXAM	
14	KENNETH FLEMING	
15	(VIDEOTAPED PROCEEI	JING)
16	9:38 o'clock a.m	n
17	July 20, 2005	· •
18 19	601 Union Stree	et
20	Suite 3100	
21	Seattle, Washingt	con
22	<u> </u>	
23		
24		
	REPORTED BY:	EVLIDIT
25	ALISON LOTT, CCR#2337	EXHIBIT 6

		Page 6			Page 8
1		some questions which are pretty personal in nature, and I'm	1		Mr. Pitts served as stake president, would you agree that
2		not doing that for any reason to embarrass you or to make	2		it would be during that time period that he served that you
3		this more difficult than it is. It's simply that it's	3		gave this letter to him and talked with him?
		necessary to go through this procedure and understand the	4	Α	To the best of my recollection, I believe that is when it
4		nature of the claims that you're making. So I want you to	5		took place. Exact year I can't give you.
5		know that in advance. If you feel uncomfortable at any	6	O	But my question was, if we were able to determine from the
6		time with a question, emotionally or any other way, if it	7	•	church records when he was stake president, that would
7		bothers you, please ask me, I'm happy to take a break and	8		be let's say if it were a four-year period, it would
8		let you go out and get a drink of water or whatever else,	9		have happened sometime during that four-year period or
9		* =	10		two-year period whenever he was stake president?
10		all right?	11	Α	I believe that's correct.
11	A	Yes. Okay. First of all, would you give me state your full	12	Q	Do you believe that the Mormon Church is the true church
12	Q	name for the record, and give me your current address.	13	Y	today?
13		Kenneth Ervin Fleming, 841 Alvord Avenue North, Kent,	13	Α	No, I don't.
14	Α		15		MR, KOSNOFF: Objection. Relevance, Not
15	_	Washington, 98031.	16		reasonably calculated to lead to relevant and admissible
16	Q	Mr. Fleming, are you still a member of the what I will	17		testimony. It also invades his rights under both the
17		refer to in this deposition as the Mormon Church?	18		federal and state constitution. What his religious beliefs
18	A	No, I'm not. Did you take any steps to formally leave the Mormon Church?	19		are are not relevant to this litigation.
19	Q		20	Q	
20	A	Yes, I did.	21	V	objections from time to time, Mr. Fleming, and unless he
21	Q	What was that? I wrote a letter to the church.	22		instructs you not to answer, his objections are for the
22	A		23		record, and then you can go ahead and answer my question.
23	Q	When did you do that? To the best of my recollection, I believe I was in my early	24		So with his objection noted, my question again is, do you
24	A	30s.	25		believe that the Mormon Church is the true church?
25		508.			
		Page 7			Page 9
		•	1		NL. I doubt
1	Q	Was that letter in conjunction with a meeting or discussion	1	A	No, I don't. When did you first become a member of the Mormon Church?
2		with any church member?	2 3	Q A	I believe that you probably have that on record; however,
3	Α	No.	4	А	that being said, I also believe it was in the early '70s.
4	Q	Did you mail the letter directly to the church?	5	Q	Do you remember how old you were?
5	A	No.	6	A	Maybe 10 to 12.
6	Q	What did you do with the letter?	7	Q	And by the way, what is your date of birth, just for
7	A	I gave it to the stake president.	8	V	purposes of this deposition, so we have a reference?
8	Q	And who was that?	9	Δ	4/1/62.
9	A	I believe at the time that was Larry Pitts.	10	A Q	So your current age today is?
10	Q	And did you have a discussion with Mr. Pitts at that time?	11	A	43.
11	A	I did. What was the nature of that discussion?	12	Q	
12	Q		13	×	did, or had they been members before you joined?
13	Α	I told him what I was going to do. He wanted me to think about it, wait. I told him I didn't think that the outcome	14	Α	They joined at the same time.
14		about it, wait. I fold fiff I digit I think that the outcome	15	Q	
15		would be any different whether I waited or whether I gave him the letter now. And so I asked him to forward it to	16	A	
16		the offices of the church.	17	Q	
17	^		18	A	
18	Q		19	Q	
19		causes you to think it was in your early thirties? Do you have some connection in time?	20	A	
20			21	Q	
21	Α		22	A	
22		was in my thirties. I can't think of the specific reason	23	Q	· · · · · · · · · · · · · · · · · · ·
23		why to give you that early thirties answer, other than to	24	- Q A	
24		say I know that's when it was.	25	Q	
1	\sim				
25	Q	If we were to go back into the church records and find when	23	~	Could you manage to me and you

		Page 10			Page 12
1		you're concerned, what you believe that your damages are as	1		now. How many brothers and sisters do you have?
2		a result of the abuse that you assert you suffered at the	2	Α	Seven.
3		hands of Jack Loholt?	3	Q	Would you give us their names, please.
4		MR. KOSNOFF: Objection, form of the	4	À	Kathy Wheeler, Diana Fleming Sirrine.
5		question.	5	Q	Would you spell her last name?
6	Q	(By Mr. Frey) Go ahead.	6	À	S-I-R-R-I-N-E.
7	Ā	Can you ask me that question again, please?	7	Q	Okay.
8	Q	Would you read it back, please.	8	À	Daniel Fleming, Christina Threlkeld.
9	~	(The pending question was read by	9	Q	Christina what?
10		the reporter.)	10	A	Threkeld.
111	Α		11	Q	Can you spell that, please?
12		have not it's been hard for me to allow people to get	12	Α	T-H-R-E-L-K-E-L-D.
13		close to me. It's hard for me to be emotionally attached	13	Q	Thank you.
14		to people. I don't know who I am sometimes; I feel lost	14	Α	,
15		sometimes. I look for direction and can't find it, and I	15	Q	Were any of your siblings, to your knowledge, ever the
16		feel like an impostor. I lost out on a family, on	16		victims of any type of sexual abuse?
17		children, on an honest and trusting relationship. I feel	17	Α	Yes.
18		that my sexual life has been damaged or hampered by the	18	Q	Which ones?
19		experiences that I was subject to as a boy. I have a hard	19	Α	Daniel Fleming.
20		time holding a job, feel like I need to like I have to	20	Q	Do you know who was the perpetrator of that abuse?
21		run away from things.	21	A	Yes.
22	Q	Anything else that you feel?	22	Q	Who?
23	À		23	Α	Jack Loholt.
24	Q	When you say that's all you wish to share, is there	24	Q	Have you talked with your brother, Daniel, about your
25	-	something more?	25		abuse?
			 		
1			ł		Page 12

Page 13 Page 11

- Not at this time.
- Okay, this is the time, I want you to be complete in your 2 O
- answer, so if there's something else that you feel you're 3
- impacted by or that has impacted you or feelings that you 4
- have, I'd like you to express those at this point. 5
- I feel that I've shared with you what I --6 Α
- Okay. And to the best of your knowledge, now, that's 7 Q everything? 8
- I can't say that that's everything, but I guess currently, 9
- sitting here with you, it is difficult to respond to the 10 questions, to share with you the emotions or the 11
- experiences that I went through, the fears, so I believe 12
- that that is what I will share with you. 13
- Okay. Would you itemize or tell me or supplement this 14 answer at any time during the deposition if you feel that 15 you have something else that you believe represents an 16
- impact on your life or a consequence, if I can put it that 17
- way, of Mr. Loholt's conduct toward you? All right? 18
- 19 Yes. Α
- In other words, before the deposition is over, if there's 20
- anything you want to add, I'd ask you to interrupt or at a 21
- break come back and say I'd like to tell you more. Would 22
- you agree to do that? 23
- 24 Α Yes.
- Okay. I'd like to ask you some questions about your family 25 Q

- My brother Dan knows that the abuse took place. He does 1
- not know the extent of the abuse. 2
- When did you tell him of the abuse? Q 3
- I believe I told my whole family in 2004. 4
- Has Dan discussed with you the abuse that he suffered? 5 Q
- 6 A Yes.
- 7 Q What did he tell you?
- Α Just that he was molested by Jack. 8
- Did he tell you more than that? 9 0
- No, he did not want to share what happened. 10 Α
- Is your bother Daniel still a member of the church? 11 0
- Yes. I believe he is. 12 Α
- Where does he currently reside? 13 Q
- In Black Diamond, Washington. 14
- Any other of your siblings been the victim of abuse as far 15 Q
- 16 as you know?
- 17 Not that I know of. Α
- Your mother is still alive; is that correct? 18 Q
- 19 That's correct. Α
- Is she still a member of the church? 20 Q
- 21 Yes, she is. Α
- How long were your biological father and your mother 22
- 23 married?
- 24 I believe they were married for approximately 17 years. Α
- 25 And did that end in a divorce? Q

					Post 14
		Page 14			Page 16
1	Α	Yes.	1	Q	Do you recall as a youngster there being either verbal or
2	Q	Did your mother remarry?	2		physical abuse in the family home as a result of your
3	A	Yes.	3		father's drinking?
4	Q	Who did she marry?	4	A	Yes.
5	Α	Donald Payne.	5	Q	When I say your father, now, I'm going to refer only to
6	Q	P-A-I-N-E?	6		your biological father; otherwise, I'll qualify it as a
7	A	P-A-Y-N-E.	7		stepparent. Was the abuse physical towards your mother, as
8	Q	Thank you. And how long did that marriage last?	8		well as verbal?
9	A	Six months.	9	A	Yes.
10	Q	Six months?	10	Q	And you actually witnessed some of that; is that correct?
11	A	Yes.	11	A	On occasion.
12	Q	I might mention to you, I have a hearing problem. You're	12	Q	When your mother and father divorced, and then she remarried, how did that marriage go as far as the
13		on my bad ear to begin with, so this I only have one	13		relationship being abusive or not abusive?
14		good one. So if I ask you to repeat, I'm not trying to	14 15	Α	I do recall one instance of abuse between the two of them.
15		give you a bad time; I just can't hear. Did your mother	16	Q	It's my understanding and correct me if I'm wrong
16		remarry again?	17	V	that there were occasions, either with your father or one
17	A	Yes. To whom?	18		of your stepfathers where your mother was actually
18	Q	Ronald Nash.	19		physically struck, and you witnessed that sort of thing; is
19	Α	And how long did that marriage last?	20		that correct?
20 21	Q A	I believe approximately nine years.	21	Α	That's correct.
22	Q	Did that end in divorce?	22	o	
23	A	Yes.	23	~	that correct?
24	Q	Did your mother remarry after that?	24	Α	I only recall two, maybe three times that I witnessed it.
25	A	Yes.	25	Q	I assume this was a matter of concern and upset for you at
		. 40.			
		Page 15			Page 17
1	Q	To whom is she married?	1		the time that it happened; is that a fair statement?
2	A	Donald Land.	2	A	I was frightened.
3	Q	L-A-N-D?	3	Q	How old is Dan, your brother Daniel?
4	À	Yes.	4	Α	41.
5	Q	Is she still married to Mr. Land?	5	Q	Are you currently receiving counseling or some sort of
6	À	Yes.	6		psychological help as far as your dealing with your abuse
7	Q	Is he a member of the church?	7		problems?
8	A	Yes.	8	Α	Yes.
9	Q	To the best of your knowledge, do your mother and	9	Q	Is that from Linda Herman?
10		stepfather still regularly attend the Mormon Church?	10	Α	Yes.
11	Α	What do you mean by regularly?	11	Q	And have you received any type of counseling or help with
12	Q	Well, put it this way: More often than not, would they be	12		your abuse problems from anyone else, other than Linda
13		in attendance?	13		Herman?
14	Α		14	A	Yes.
15	Q	How old were you when your biological father and your	15	Q	Who would that be?
16		mother divorced? Approximately. I don't need the exact	16	A	Fred Denison.
17		age.	17	Q	And Fred Denison is whom?
18	A		18	A	He is, or was, a counselor for the Mormon Church.
19	Q	You were in grade school, then, at the time; is that a fair	19	Q	And when did you receive counseling from Fred Denison?
20		statement?	20	A	Shortly after my mission.
21	A	Yes.	21	Q	Do you remember when your mission was?
22	Q	What do you understand the reason for that divorce to be,	22	A	I served from 1981 to 1983.
23		if you have one?	23	Q	So when you returned from your mission is when you
24	A	I believe that my father had a drinking problem, which	24		sometime after that? Was it within a year or can you
25		created other problems which led to the divorce.	25		pinpoint it a little bit for me?

1 A I would say one to three years, maybe. 2 Q Why did you go to see Fred Denison? 3 A Because I felt guilty. 4 Q Guilty about what? 5 A Of the sexual abuse. 6 Q How long did you see Fred Denison? 7 A I believe that the church gave me 12 visits. 8 Q Did you see someone first, before you went to see Fred Denison so that they would authorize or enable you to get some help? 11 A No. 2 Q When you say the church authorized 12 visits, how did that come about? Who did you talk to? 2 Q When you say the church authorized it is visit. 3 I a before I lef on my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back printing the church would do. He authorized six visus I saked him; from your mission? 2 Q Who was your bishop hat you spoke with before you left on your mission? 2 Q And when you returned from your mission, who was your bishop? 3 A I believe it was Hoisington. I don't recall his first name, other than bishop. 1 Q And where did you physically go to meet with Mr. Fred believe. 3 Q And where did you physically go to meet with Mr. Fred believe. 4 Q Denison? 5 Q A that time, you were living in Provo? 5 Q A that time, you were living in Provo? 6 Q A that imm, you were living in Provo? 7 Q And what were you employed — you were employed down there, were you not? 8 Q A now you to did you work			DEPOSITION OF REINING TELIMING TELIMING			
2			Page 18			Page 20
2 Q Why did you go to see Fred Denison? 3 A Because I felt guilty. 4 Q Guilty about what? 5 A Of the sexual abuse. 6 Q How long did you see Served the church gave me 12 visits. 9 Did you see senomen first, before you went to see Fred Denison so that they would authorize or enable you to get some help? 11 A No. 2 Q When you say the church authorized 12 visits, how did that come about? Who did you talk to? 12 Q When you say the church authorized 12 visits, how did that come about? Who did you talk to? 13 A English of the first per got back from my mission, I spoke with my bishop about i. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my your mission? 20 Q Who was your bishop that you spoke with before you left on your mission? 21 A I spoke with Richard Pettit. 22 Q And when you returned from your mission, who was your bishop? 23 L Denison? 24 A I beheve it was Hoisington. I don't recall his first name, other than hishop. 25 Denison? 26 A Reprove or Crem. 27 Q And where did you physically go to meet with Mr. Fred Denison? 28 A Denison? 29 A No, I was attending about. 20 A I was attending action. 20 Q Who was attending action. 21 Q And what were you employed — you were employed down there, were you not? 22 Q And that time, you were living in Provo? 23 A No Was attending action. 24 A No, it was for an insalation company. 25 Q And what were you employed — you were employed down there, were you not? 26 Q And what were you employed — you were employed down there, were you not? 27 Q And what were you employed — you were employed down there, were you not? 28 Q And what was for some coal company or coal distributing company. 29 A No, I was attending BYU at the time? 20 Q And you were attending by U at the time? 21 Q And that was for some coal company. 22 Q Have you ever attended BYU? 23 A Loud Technical College. 24 A I did not leave with a degree. 25 Q But did you complete your studies? Did you get enough controlled your powers. And I told in mabule the ab	1	Α	I would say one to three years, maybe.	1	Q	
3 A Because I felt guilty. 4 Q Guilty about what? 5 A Of the sexual abuse. 6 Q How long did you see Fred Demison? A 1 believe that the church gave me 12 visits. 8 Q Did you see someone first, before you went to see Fred Demison so that they would authorize or enable you to get some help? 10 Some help? 11 A No. 12 Q When you say the church authorized 12 visits, how did that come about? Who did you talk to? 13 come about? Who did you talk to? 14 A Defore I left on my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it, and I asked him, was there anything the church would do. He authorized six visits. I asked him if I could see him a little longer. He authorized six more. I spoke with Richard Pettit. 19 Q Who was your bishop that you spoke with before you left on your mission? 11 A 1 spoke with Richard Pettit. 12 Q And when you returned from your mission, who was your bishop? 13 A I believe it was Hossington. I don't recall his first name, other than bishop. 14 A No. 15 Demison? 15 A No. 16 A Prove or Orem. 17 Q And what were you employed you were employed down there, were you not? 18 A No. I was afroating school. 19 Q And what were you employed you were employed down there, were you not? 19 A No, I was afroating school. 20 A No. 21 A No, I was afroating school. 22 Q And that was for some coal company or 23 Q And what were you employed you were employed down there, were you not? 24 A No, I was afroating school. 25 Q So you were attending what? 26 A No. 27 Yes. 28 Q And that was for some coal company or coal distributing company or 18 A No. I was for some coal company or 19 Q And what were you employed your studies at Utah Technical? 29 Q And that was for some coal company. 20 A No. 21 Q Did you complete your studies? Did you get enough could be guited and you complete your studies? Did you get enough could be guited. The process was taken on the propose was to try to get rid of the guilt live accuration. After feet, but the fore guilt into w	2	Q	Why did you go to see Fred Denison?	2		
5 A Of the sexual abuse. 6 Q How long did you see Fred Demison? 7 A 1 believe that the church gave me 12 visits. 8 Q Did you see someone first, before you went to see Fred Demison so that they would authorized a ready to get some help? 10 Some help? 11 A No. 12 Q When you say the church authorized 12 visits, how did that conta about? Who did you talk to? 13 conta about? Who did you talk to? 14 A Before I left on my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it, and I saked him, was there anything the church would do. He authorized six visits. I asked him? 15 I could see him a little longer. He authorized six worst. 16 Q Who was your bishop that you spoke with before you left on your mission? 21 A I spoke with Richard Petit. 22 Q And when you returned from your mission, who was your bishop? 23 A I believe it was Hosisington. I don't recall his first name, other than bishop. 24 A I believe it was Hosisington. I don't recall his first name, other than bishop. 25 Q Ard where did you physically go to meet with Mr. Fred Demison? 26 A Provo or Orem. 27 Q And what were you employed — you were employed down there, were you no? 28 A No. I was aftending school. 29 A No. I was aftending school. 20 Q And what were you employed — you were employed down there, were you no? 21 Q And what was for some coal company or coal distributing company or — 22 Q And that time, you were laving in Provo? 23 A No. I was aftending school. 24 A No. I was aftending school. 25 Q Soyou were attending bhu? 26 Q And what were you employed — you were employed down there, were you no? 27 Q And what was for some coal company or coal distributing company or — 28 Q May to you were attending bhu? 29 Q Who was your were attended BYU? 20 A No. I was aftending school. 21 Q Did you completely our studies at Utah Technical? 22 Q Have you ever attended BYU? 23 Q But did you complete your studies? 24 Did you complete your studies? 25 Did you were attending bhu? 26	3			3	A	
5 A Of the sexual abuse. Q How long did you see Fred Demison? A Did you see someone first, before you went to see Fred Demison so that they would authorize or enable you to get some help? A No. When you say the church authorized 12 visits, how did that comma about? Who did you talk 16? When you say the church authorized 12 visits, how did that control and a seed him, was there anything the bishop about it, and I asked him, was there anything the church would do. He authorized six visits. I asked him? I could see him a little longer. He authorized six worst. Q Who was your bishop that you spoke with my bishop about it, and I seed him, was there anything the church would do. He authorized six visits. I asked him? I could see him a little longer. He authorized six worst. You you wission? A I spoke with Richard Petit. And when you returned from your mission, who was your bishop? A I believe it was Hoisington. I don't recall his first name, other than bishop. A Demison? A In Provo, Utah, at a church social service building. I believe. A Provo O'rorn. A Pow O'rorn. A Pow O'rorn. A Pow O'rorn. A Pow O'rorn. A No, I was afreading school. A Provo o'rorn. A No, I was afreading school. A Pow ow were attending swol. A No, I was afreading BYU at the time? A No, I was a fracing BYU at the time? A Pow ou were attending BYU at the time? A No, I was a complexely our studies at Utah Technical? A I did not leave with a degree. Did you complete your studies at Utah Technical? Did you complete your studies of the first that was for some coal company or coal distributing company or coal	4	Q	Guilty about what?	4	Q	
7 A 1 believe that the church gave me 12 visits. 8 Q Did you see someone first, before you went to see Fred Denison so that they would authorize or enable you to get some help? 10 some help? 11 A No. 12 Q When you say the church authorized 12 visits, how did that come about? Who did you talk to? 13 come about? Who did you talk to? 14 A Before I left on my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop may be added to misson, specifically? 10 A how have we you read it into my mission from the abuse by Jack Loholt; is that correct? 11 Q And where did you physically go to meet with Mr. Fred Denison? 22 Denison? 23 A In Provo, Utah, at a church — social service building, I believe were you my my mind, I want to get these dates down. You served on your mission from the guest har	5			5		
8 Q Did you see someone first, before you went to see Fred Demisons of beth? 11 A No. 20 When you say the church authorized 12 visits, how did that come about? Who did you talk to? 12 A Before I left on my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. I leaft to many a got back and it. I leaft to many a got back and it. I leaft to many a got back and it. I leaft to many a got back and it. I leaft to many a got back and a leaft to many a g	6	Q	How long did you see Fred Denison?			
Denison so that they would authorize or enable you to get some help? A No. Denison so that they would authorize or enable you to get some help? A Poro or Oren. A A Before I left on my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about it. After I got back from my mission, I spoke with my bishop about and I form my mission. I can't complete your studies at Utah Technical? A I believe it was Hossington. I don't recall his first name, other than bishop. Page 19 I Q And where did you physically go to meet with Mr. Fred Denison? A In Provo, Utah, at a church — social service building, I believe. A Provo or Oren. A No, I was attending school. A No, I was attending school. A No, I was for an insulation company. A No,	7	Α	I believe that the church gave me 12 visits.	•	-	
some help? 11 A No. 2 Q When you say the church authorized 12 visits, how did that come about? Who did you talk to? 3 A Before I left on my mission, I spoke with my bishop about it, and I asked him, was there anything the church would do. He authorized six visits. I asked him if I could see him a little longer. He authorized six more. Who was your bishop that you spoke with before you left on your mission? 21 A I spoke with Richard Pettit. 22 A I spoke with Richard Pettit. 23 bishop? 24 A I believe it was Hoisington. I don't recall his first name, other than bishop. 25 believe. 26 A Who was your bishop that you spoke with Mr. Fred Denison? 3 A In Provo, Utah, at a church social service building, I believe. 4 A Provo or Orem. 4 A Provo or Orem. 5 Q Art that time, you were living in Provo? 4 A No. 2 A And what were you employed you were employed down there, were you not? 2 A No. 2 A And that was for some coal company or coal distributing company or 4 A No. 2 Q And that was for some coal company or coal distributing company or 4 A No. 2 Q And that vas for some coal company or coal distributing company or 4 A No. 2 Q Did you were attending BYU at the time? 3 A In Provo used attending school. 4 A No. 2 Q Did you complete your studies at Utah Technical? 2 A I did not leave with a degree. 3 A Utah Technical College. 3 But did you complete your studies? Did you get enough correct was to try to get rid of the guilt I was carrying. The other purpose was to try to get rid of the guilt I was carrying. The other purpose was to try to get rid of the guilt I was carrying. The other purpose was to try to get rid of the guilt I was carrying. The other purpose was to try to get rid of the guilt I was carrying. The other purpose was to try to get rid of the guilt I was carrying. The other purpose was to try to get may be only recall and in the purpose was to try to get rid of the guilt I was carrying. The other purpose was to try to get rid of the guilt I was carrying. The other purpos	8	Q	Did you see someone first, before you went to see Fred			
A No. A No.	9		Denison so that they would authorize or enable you to get		Q	
When you say the church authorized 12 visits, how did that come abour? Who did you talk to? A Before I left on my mission, I, spoke with my bishop about it. After I got back from my mission, I, spoke with my bishop about it. After I got back from my mission, I, spoke with my bishop about it. After I got back from my mission, I, spoke with my bishop about it, and I asked him, was there anything the church would do. He authorized six visits. I asked him if I could see him a little longer. He authorized six more. Who was your bishop that you spoke with before you left on your mission? A I spoke with Richard Pettit. A I spoke with Richard Pettit. A I spoke with Richard Pettit. A I leive it was Hoisington. I don't recall his first name, other than bishop. Page 19	10		some help?			specifically?
year and where did you physically go to meet with Mr. Fred Denison? A Ad where did you physically go to meet with Mr. Fred Denison? A I believe it was Hoisington. I don't recall his first name, other than bishop. Page 19 A A No, I was attending school. A No, I was attending school. A No, I was for an insulation company. A Old you were attending BYU at the time? A No, I was for an insulation company. A Utah Technical College. Bark A Spoke with a degree. Bark I spoke with my bishop about it, and I asked about why 1 felt I could report and the provey page and the was the solution of the abuse on that for a minuscular to so in that fide name your extraction. And there may be other purpose but it's been many years ago. My initial intentions, I — Leart completely recall. MR. KOSNOFF: Tom, I'm sorry. I know we've only recently gotten started, but I do need a brief bathroom break. MR. KOSNOFF: Tom, I'm sorry. I know we've only recently gotten started, but I do need a brief bathroom break. MR. KOSNOFF: Tom, I'm sorry. I know we've only recently gotten started, but I do need a brief bathroom break. MR. KOSNOFF: Tom, I'm sorry. I know we've only recently gotten started, but I do need a brief bathroom break. MR. KOSNOFF: Till ry and be quick. MR. FREY: Okay. MR. KOSNOFF: Till ry and be quick. MR. FREY: All right. The VIDEOGRAPHER: Bock on the record. The VIDEOGRAPHER: Bock on	11	Α			Α	1 believe that one of the purposes was to try to get hid of
bishop about it, and I asked him, was three anything the church would do. He authorized six visits. I asked him if I could see him a little longer. He authorized six more. Very commission? I could see him a little longer. He authorized six more. Very commission? I could see him a little longer. He authorized six more. Very commission? I could see him a little longer. He authorized six more. Very commission? I could see him a little longer. He authorized six more. Very commission? I could see him a little longer. He authorized six more. Very commission? I could see him a little longer. He authorized six more. Very commission? I could see him a little longer. He authorized six more. Very commission? I could see him a little longer. He authorized six more. Very commission? I could see him a little longer. He authorized six more. Very commission? I could see him a little longer. He authorized six more. Very commission? I could see him a little longer. He authorized six more. Very commission? I could see him a little longer. He authorized six more. Very commission? I commission Proson. Very commission. I don't recall his first mame, other than bishop. Page 19 I Q And where did you physically go to meet with Mr. Fred Denison? A In Provo, Utah, at a church — social service building, I believe. Very commission? A In Provo, Utah, at a church — social service building, I believe. A Provo or Orem. A Provo or Orem. Very commission find you were living in Provo? A A Provo or Orem. A No, I was attending school. A No, I was attending BYU at the time? A No, I was attending BYU at the time? A No, I was for an insulation company. A No, I was attending BYU at the time? A No, I was for an insulation company. A No, I was for an insulation company. A No, I was for an insulation company. A No, I was	12	Q				
15 It. After I got back from my mission, I spoke with my bishop about it, and I asked him, was there anything the church would do. He authorized six wists. I asked him if I could see him a little longer. He authorized six more. 18 Q Who was your bishop that you spoke with before you left on your mission? 21 A I spoke with Richard Pettit. 22 Q And when you returned from your mission, who was your bishop? 23 bishop? 24 A Delieve it was Hoisington. I don't recall his first name, other than bishop. 25 Page 19 1 Q And where did you physically go to meet with Mr. Fred Denison? 3 A In Provo, Utah, at a church social service building, I believe. 4 Provo or Orem. 4 Provo or Orem. 5 Q Athat time, you were living in Provo? 6 A Provo or Orem. 7 Q And what were you employed you were employed down there, were you not? 9 A No, I was attending school. 10 Q At one point, did you work in Utah? 11 A Yes. 12 Q And that was for some coal company or coal distributing company or 12 Q You were attending BYU at the time? 13 A Utah Technical College. 14 A No, I was of an insulation company. 15 Q You were attended BYU? 16 A No. 17 Q You were attended BYU? 28 A Idd dot leave with a degree. 29 But did you complete your studies at Utah Technical? 20 But did you complete your studies at Utah Technical? 21 A first was for sam years. And I told him about the abus to so that did you get enough or the did you get enough or the studies of the abus objects for many years. And I was four any years. And I was not any year attended were you with him? 15 Q But did you complete your studies? Did you get enough or the pick of the proper studies? Did you get enough or the pick of the proper studies? Did you get enough or the pick of the proper studies? Did you get enough or the pick of the proper studies? 16 A no. 17 Q Did you complete your studies? Did you get enough or the pick of the proper studies? Did you get enough or the pick of the proper studies? Did you get enough or the pick of the proper studies? Did you	13		come about? Who did you talk to?			give me some direction. And there may be office purposes,
bishop about it, and I asked him, was there anything the church would do. He authorized six visits. I asked him if I could see him a little longer. He authorized six more. Your mission? Who was your bishop that you spoke with before you left on your mission? A I spoke with Richard Pettit. A I believe it was Hoisington. I don't recall his first name, other than bishop. Page 19 A I believe it was Hoisington. I don't recall his first name, other than bishop. Page 19 A In Provo, Utah, at a church social service building, I believe. A In Provo, Utah, at a church social service building, I believe. A Provo or Orem. A No, I was attending school. A No, I was attending school. A No, It was for an insulation company. A No, It was for an insulation company. A No, I was attending BYU at the time? A No. Your were attending Mat? A Utah Technical College. A Idid not leave with a degree. A Idid not leave with a degree. A Idid not leave with a degree. A RosNOFF: Ton, I'm sorry. I know only each wonly recently gotten started, but I do need a brief bathroom break. MR. KOSNOFF: Dil try and be quick. MR. FREY: All right. THE VIDEOGRAPHER: Going off the record. The time now is approximately 10:14 a.m. (A brief recess was taken.) THE VIDEOGRAPHER: Back on the record. The time now is approximately 10:14 a.m. (By Mr. Frey) Mr. Fleming, in my own mind, I want to to get these dates down. You served on your mission for least to to get these dates down. You served on your mission for least to to get these dates down. You served on your mission for least to to get these dates down. You served on your mission for least to to get these dates down. You served on your mission for least to to get these dates down. You served on your mission for least to to get these dates down. You correct? A That's not completely our restmeding least to the abuse by Jack Loholt; is that correct? A That's not completely our standies at Utah Technical? A Ves. A Utah Technical College. A I did not leave with a degree. A I di	ı	Α	Before I left on my mission, I spoke with my bishop about			
time now is approximately 10:18 a.m. Page 19 1 Q And where did you physically go to meet with Mr. Fred Denison? 2 A I spoke with at a church — social service building, I believe. 3 Q And where did you physically go to meet with Mr. Fred Denison? 4 A I provo, Utah, at a church — social service building, I believe. 5 Q At that time, you were living in Provo? 6 A Provo or Orem. 7 Q And what were you ner? 9 A No, I was for an insulation company. 10 Q And that was for some coal company or coal distributing company or — 14 A No, it was for an insulation company. 11 Q You were attending BYU at the time? 12 Q You were attending BYU at the time? 13 Q Have you every attended BYU? 14 A I did not leave with a degree. 15 Q Have you complete your studies? Did you get enough crist poet a degree? Put it that way. 16 A Provo complete your studies? Did you get enough crist for the abuse of Jack plan that way. 17 A Indian think the page to so way that I was abused by Jack for many years. And I was not - I don't recall being very detailed, other that a country on a mission, we talked about why I felt 1 couldn't go on a mission, we talked about why I felt 1 couldn't go on a mission, we talked about why I felt 1 couldn't go on a mission, we talked about why I felt 1 couldn't go on a mission, we talked about why I felt 1 couldn't go on a mission, we talked about why I felt 1 couldn't go on a mission, and I told in think im? A total read that was a boused by Jack for many years. And I was not - I don't recall being very detailed, other that couldn't go on a mission. And I told in think im? A total read that was a boused by Jack for many years. And I was not - I don't recall being very detailed, other that countries to a degree.	ı		it. After I got back from my mission, I spoke with my			
18	\$		bishop about it, and I asked him, was there anything the			
19 Who was your bishop that you spoke with before you left on your mission? 20	ŧ					
your mission? A I spoke with Richard Pettit. Q And when you returned from your mission, who was your bishop? A I believe it was Hoisington. I don't recall his first name, other than bishop. Page 19 1 Q And where did you physically go to meet with Mr. Fred Denison? A In Provo, Utah, at a church social service building, I believe. A Provo or Orem. A Provo or Orem. A No, I was attending school. Q And what were you employed you were employed down there, were you not? A No, I was for an insulation company. A No, It was for an insulation company. A No, It was for an insulation company. A No, I was for an insulation company. A No, I was or an insulation company. A No, I was for an insulation company.			I could see him a little longer. He authorized six more.			**
A I believe it was Hoisington. I don't recall his first name, other than bishop. Page 19 Q And where did you physically go to meet with Mr. Fred Denison? A In Provo, Utah, at a church social service building, I believe. A Provo or Orem. Q And what were you employed you were employed down there, were you not? A No, I was attending school. Q At one point, did you work in Utah? A No, I was for an insulation company. A No, it was for an insulation company. A No, it was for an insulation company. A No, I was attending BYU at the time? A No, I was attending BYU at the time? A No, I was attending BYU at the time? A No, I was attending BYU at the time? A No, I was attending BYU at the time? A No, I was dro an insulation company. B A Utah Technical College. C A I did not leave with a degree. B A Utah Technical College. B A Utah Technical College. C A I did not leave with a degree. B A Utah Technical College. C A I did not leave with a degree. B A Utah Technical College. C A I did not leave with a degree. B A I did not leave with a degree. B A I did not leave with a degree. B A I did not leave with a degre		Q				-
22 Q And when you returned from your mission, who was your bishop? 23 bishop? 24 A I believe it was Hoisington. I don't recall his first name, other than bishop. 25 name, other than bishop. 26 Page 19 27 I Q And where did you physically go to meet with Mr. Fred Denison? 28 A In Provo, Utah, at a church social service building, I believe. 39 A In Provo, Utah, at a church social service building, I believe. 40 A Provo or Orem. 41 O And what were you were living in Provo? 42 A No, I was attending school. 43 A Provo or Orem. 44 Provo or Orem. 45 O And what were you employed you were employed down there, were you not? 46 A Provo or Orem. 47 O And what were you employed you were employed down there, were you not? 48 A No, I was attending school. 49 A No, I was attending school. 50 Q And that was for some coal company or coal distributing company or 51 Q O And that was for some coal company or coal distributing company or 52 Q And that was for some coal company. 53 Q So you were attending BYU at the time? 54 A No, it was for an insulation company. 55 Q So you were attending BYU at the time? 56 A No. 57 Q You were attending BYU at the time? 58 A Utah Technical College. 59 A Vou So you were attending what? 50 A No. 51 Did you complete your studies at Utah Technical? 52 A I did not leave with a degree. 58 A Utadi Tothina I was for some coal company or coal distributing company or 58 C D D D D D D D D D D D D D D D D D D						
23 bishop? 24 A I believe it was Hoisington. I don't recall his first name, other than bishop. 25 Page 19 1 Q And where did you physically go to meet with Mr. Fred Denison? 3 A In Provo, Utah, at a church social service building, I believe. 4 believe. 5 Q At that time, you were living in Provo? 6 A Provo or Orem. 7 Q And what were you employed you were employed down there. 8 were you not? 9 A No, I was attending school. 10 Q At one point, did you work in Utah? 11 A Yes. 12 Q And that was for some coal company or coal distributing company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough critical in the subsed by Jack for many years. And I was abused by Jack for many years. And I was abused by Jack for many years. And I was abused by Jack for many years. And I was abused by Jack for many years. And I was abused by Jack for many years. And I was abused by Jack for many years. And I was abused by Jack for many years. And I was not I don't recall being very detailed, other that to say that I was abused by Jack for many years. And I						
A I believe it was Hoisington. I don't recall his first name, other than bishop. Page 19 1 Q And where did you physically go to meet with Mr. Fred Denison? 3 A In Provo, Utah, at a church social service building, I believe. 5 Q At that time, you were living in Provo? 6 A Provo or Orem. 7 Q And what were you employed you were employed down there, were you not? 9 A No, I was attending school. 10 Q At one point, did you work in Utah? 11 A Yes. 12 Q And that was for some coal company or coal distributing company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you everleted BYU? 20 A I told not leave with a degree. 21 Q But did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough of the pains of the pains of the abuse of the province o	ł	Q				
Page 19 1 Q And where did you physically go to meet with Mr. Fred Denison? 3 A In Provo, Utah, at a church social service building, I believe. 4 Denison? 5 Q At that time, you were living in Provo? 6 A Provo or Orem. 7 Q And what were you employed you were employed down there, were you not? 9 A No, I was attending school. 10 Q At one point, did you work in Utah? 11 A Yes. 12 Q And that was for some coal company or coal distributing company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you everleded BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 21 C Ind In	1		bishop?			
Page 19 1 Q And where did you physically go to meet with Mr. Fred 2 Denison? 3 A In Provo, Utah, at a church social service building, I 4 believe. 5 Q At that time, you were living in Provo? 6 A Provo or Orem. 7 Q And what were you employed you were employed down there, 8 were you not? 9 A No, I was attending school. 10 Q At one point, did you work in Utah? 11 A Yes. 12 Q And that was for some coal company or coal distributing 13 company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A I did not leave with a degree. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough 24 credits to est a degree? Put it that was.	1	Α				
1 Q And where did you physically go to meet with Mr. Fred 2 Denison? 3 A In Provo, Utah, at a church social service building, I 4 believe. 5 Q At that time, you were living in Provo? 6 A Provo or Orem. 7 Q And what were you employed you were employed down there, 8 were you not? 9 A No, I was attending school. 10 Q At one point, did you work in Utah? 11 A Yes. 12 Q And that was for some coal company or coal distributing 13 company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 21 A Idid not leave with a degree. 22 Q But did you physically go to meet with Mr. Fred 2	25		name, other than dishop.	20		***
Denison? A In Provo, Utah, at a church social service building, I believe. A In Provo or Orem. A Provo or Orem. A No, I was attending school. A Yes. A And that was for some coal company or coal distributing company or A No, it was for an insulation company. A Utah Technical College. A Utah Technical College. A No. Did you complete your studies at Utah Technical? A No. Did you complete your studies at Utah Technical? A It did not leave with a degree. Believe. A In Provo, Utah, at a church social service building, I to get these dates down. You served on your mission for 1981 of the abus to get these dates down. You served on your mission for 1981 of the abus You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 of the abus. You told your bishop when you returned in 1983 o			Page 19			Page 21
Denison? A In Provo, Utah, at a church social service building, I believe. 5 Q At that time, you were living in Provo? 6 A Provo or Orem. 7 Q And what were you employed you were employed down there, were you not? 9 A No, I was attending school. 10 Q At one point, did you work in Utah? 11 A Yes. 12 Q And that was for some coal company or coal distributing company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you complete your studies at Utah Technical? 20 Q But did you complete your studies? Did you get enough credits to get these dates down. You served on your mission from 1981 of the abuse of the gates dates down. You served on your mission from 1981 of the abuse of the gates dates down. You served on your mission from 1981 of the abuse of the gates dates down. You served on your mission from 1981 of the abuse, if I understand your testimony; is that correct? A That's not completely correct. 8 Q Okay. Correct me, then. Where am I wrong? 1 I told my bishop in approximately 1979-1980. 1 A Yes. 1 Ves.	۱.	O	And where did you physically go to meet with Mr. Fred	1		time now is approximately 10:18 a.m.
3 A In Provo, Utah, at a church social service building, I 4 believe. 5 Q At that time, you were living in Provo? 6 A Provo or Orem. 7 Q And what were you employed you were employed down there, 8 were you not? 9 A No, I was attending school. 10 Q At one point, did you work in Utah? 11 A Yes. 12 Q And that was for some coal company or coal distributing 13 company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough 24 credits to set a degree? Put it that way. 25 C At that time, you were building, I 26 A that time, you were eliving in Provo? 4 1981 to 1983. You told your bishop in 1981 of the abus 4 1981 to 1983. You told your bishop in 1981 of the abus 4 1981 to 1983. You told your bishop in 1981 of the abus 4 1981 to 1983. You told your bishop in 1981 of the abus 4 1981 to 1983. You told your bishop in 1981 of the abus 4 1981 to 1983. You told your bishop when you returned in 1983 of the abuse, if I understand your testimony; is that correct? A That's not completely correct. Q Okay. Correct me, then. Where am I wrong? I told my bishop in approximately 1979-1980. I told my bishop in approximately 1979-1980. I wasn to focus on that for a minute. At the time, what did you tell him? What did you MR. KOSNOFF: Objection, form of the question, referring to the 1979? MR. FREY: 1979. I told him that I didn't think I would be able to go on a mission, but my friends were going on missions and I wo. So in that discussion, we talked about why I felt I couldn't go on a mission. And I told him about the abus 24 Credits to set a degree? Put it that way.	I -	•		2	Q	
believe. 4	!	A	In Provo, Utah, at a church social service building, I	3		
6 A Provo or Orem. 7 Q And what were you employed you were employed down there, 8 were you not? 9 A No, I was attending school. 10 Q At one point, did you work in Utah? 11 A Yes. 12 Q And that was for some coal company or coal distributing 13 company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough 24 credits to get a degree? Put it that way. 6 abuse, if I understand your testimony; is that correct? 7 A That's not completely correct. 8 Q Okay. Correct me, then. Where am I wrong? 9 A I told my bishop in approximately 1979-1980. 10 Q And you told him of the abuse by Jack Loholt; is that correct? 11 correct? 12 A Yes. 13 Q I want to focus on that for a minute. At the time, what did you rell him? What did you 14 MR. KOSNOFF: Objection, form of the question, referring to the 1979? 15 MR. FREY: 1979. 16 A No. 17 Q You were attended BYU? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough credits to get a degree? Put it that way.	4			4		1981 to 1983. You told your bishop in 1981 of the abuse.
7 Q And what were you employed you were employed down there, were you not? 9 A No, I was attending school. 10 Q At one point, did you work in Utah? 11 A Yes. 12 Q And that was for some coal company or coal distributing company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough credits to get a degree? Put jit that way. 24 Chalk a Were you ever and were employed down there, were approximately 1979-1980. 25 Q Okay. Correct me, then. Where am I wrong? 26 Q Okay. Correct me, then. Where am I wrong? 27 A I told my bishop in approximately 1979-1980. 28 Q Okay. Correct me, then. Where am I wrong? 29 A I told my bishop in approximately 1979-1980. 20 And you told him of the abuse by Jack Loholt; is that correct? 21 A Yes. 22 A I wan to focus on that for a minute. At the time, what did you tell him? What did you 29 MR. KOSNOFF: Objection, form of the question, referring to the 1979? 20 A No. 21 Couldn't go on a mission. And I told him about the abuse to So in that discussion, we talked about why I felt I couldn't go on a mission. And I told him about the abuse to say that I was abused by Jack for many years. And I	5	Q	At that time, you were living in Provo?	5		You told your bishop when you returned in 1983 of the
were you not? 9 A No, I was attending school. 10 Q At one point, did you work in Utah? 11 A Yes. 12 Q And that was for some coal company or coal distributing company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough 24 credits to get a degree? Put it that way. 8 Q Okay. Correct me, then. Where am I wrong? 9 A I told my bishop in approximately 1979-1980. 10 Q And you told him of the abuse by Jack Loholt; is that correct? 11 correct? 12 A Yes. 13 Q I want to focus on that for a minute. At the time, what did you tell him? What did you 15 MR. KOSNOFF: Objection, form of the question, referring to the 1979? 16 A I told him that I didn't think I would be able to go on a mission, but my friends were going on missions and I we to. So in that discussion, we talked about why I felt I couldn't go on a mission. And I told him about the abuse to say that I was abused by Jack for many years. And I was not I don't recall being very detailed, other that to say that I was abused by Jack for many years. And I	1	-		6		
9 A No, I was attending school. 10 Q At one point, did you work in Utah? 11 A Yes. 12 Q And that was for some coal company or coal distributing 13 company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough coredits to get a degree? Put it that way. 24 Credits to get a degree? Put it that way. 25 A I told my bishop in approximately 1979-1980. 26 And you told him of the abuse by Jack Loholt; is that correct? 27 And yes. 28 A I told my bishop in approximately 1979-1980. 29 A I told my bishop in approximately 1979-1980. 20 And you told him of the abuse by Jack Loholt; is that correct? 21 A Yes. 21 A Yes. 22 A Yes. 23 C I want to focus on that for a minute. At the time, what did you 29 A No. 20 I want to focus on that for a minute. At the time, what did you 20 A No. 21 C I want to focus on that for a minute. At the time, what did you 21 A Yes. 22 A I told him? What did you 23 A I told him that I didn't think I would be able to go on a mission, but my friends were going on missions and I was not I don't recall being very detailed, other that to say that I was abused by Jack for many years. And I	7	Q	And what were you employed you were employed down there,		Α	That's not completely correct.
9 A No, I was attending school. 10 Q At one point, did you work in Utah? 11 A Yes. 12 Q And that was for some coal company or coal distributing 13 company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough 24 credits to get a degree? Put it that way. 29 A I told my bishop in approximately 1979-1980. 20 A nd you told him of the abuse by Jack Loholt; is that correct? 21 A Yes. 21 Q And you told him of the abuse by Jack Loholt; is that correct? 21 A Yes. 21 Q I want to focus on that for a minute. At the time, what did you tell him? What did you 20 I want to focus on that for a minute. At the time, what did you everlib him? What did you 21 A Yes. 22 A I told him the focus on that for a minute. At the time, what did you tell him? What did you 23 A I told him that I didn't think I would be able to go on a mission, but my friends were going on missions and I was not I don't recall being very detailed, other that to say that I was abused by Jack for many years. And I	8	-	were you not?	8	Q	Okay. Correct me, then. Where am I wrong?
11 A Yes. 12 Q And that was for some coal company or coal distributing 13 company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough credits to get a degree? Put it that way. 11 correct? 12 A Yes. 13 Q I want to focus on that for a minute. At the time, what did you 14 did you tell him? What did you 15 MR. KOSNOFF: Objection, form of the question, referring to the 1979? 18 A I told him that I didn't think I would be able to go on a mission, but my friends were going on missions and I was not I don't recall being very detailed, other that to say that I was abused by Jack for many years. And I	1	Α		9	Α	
12 Q And that was for some coal company or coal distributing 13 company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough credits to get a degree? Put it that way. 24 Yes. 13 Q I want to focus on that for a minute. At the time, what did you 15 MR. KOSNOFF: Objection, form of the question, referring to the 1979? 18 A I told him that I didn't think I would be able to go on a mission, but my friends were going on missions and I we to. So in that discussion, we talked about why I felt I couldn't go on a mission. And I told him about the abus to say that I was not I don't recall being very detailed, other than to say that I was abused by Jack for many years. And I	10	Q	At one point, did you work in Utah?	10	Q	•
13 Company or 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough credits to get a degree? Put it that way. 13 Q I want to focus on that for a minute. At the time, what did you 14 did you tell him? What did you 15 MR. KOSNOFF: Objection, form of the question, referring to the 1979? 16 A I told him that I didn't think I would be able to go on a mission, but my friends were going on missions and I was not I don't recall being very detailed, other than to say that I was abused by Jack for many years. And I	11	A		1		.
13 Q I want to focus on that for a minute. At the time, what 14 A No, it was for an insulation company. 15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough 24 credits to get a degree? Put it that way. 21 I want to focus on that for a minute. At the time, what 22 did you tell him? What did you 23 Q I want to focus on that for a minute. At the time, what 24 did you tell him? What did you 25 MR. KOSNOFF: Objection, form of the 26 question, referring to the 1979? 27 NR. FREY: 1979. 28 A I told him that I didn't think I would be able to go on a mission, but my friends were going on missions and I was not I don't recall being very detailed, other that to say that I was abused by Jack for many years. And I	12	Q	And that was for some coal company or coal distributing			
15 Q So you were attending BYU at the time? 16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough credits to get a degree? Put it that way. 15 MR. KOSNOFF: Objection, form of the question, referring to the 1979? 16 A I told him that I didn't think I would be able to go on a mission, but my friends were going on missions and I was not a mission. And I told him about the abus credits to get a degree? Put it that way. 26 A I was not I don't recall being very detailed, other than to say that I was abused by Jack for many years. And I		_	company or		Q	
16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough credits to get a degree? Put it that way. 16 question, referring to the 1979? 17 MR. FREY: 1979. 18 A I told him that I didn't think I would be able to go on a mission, but my friends were going on missions and I was in the discussion, we talked about why I felt I couldn't go on a mission. And I told him about the abus 22 Q How detailed were you with him? 23 A I was not I don't recall being very detailed, other than to say that I was abused by Jack for many years. And I	14	Α				did you tell him? What did you
16 A No. 17 Q You were attending what? 18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough credits to get a degree? Put it that way. 16 question, referring to the 1979? 17 MR. FREY: 1979. 18 A I told him that I didn't think I would be able to go on a mission, but my friends were going on missions and I was not under the about the abuse of the couldn't go on a mission. And I told him about the abuse a ladid you complete your studies? Did you get enough credits to get a degree? Put it that way. 24 Vou were attending what? 15 MR. FREY: 1979. 16 A I told him that I didn't think I would be able to go on a mission, but my friends were going on missions and I was not ladid about why I felt I couldn't go on a mission. And I told him about the abuse are going on missions and I was not ladid about why I felt I couldn't go on a mission. And I told him about the abuse are going on missions and I was not ladid about why I felt I couldn't go on a mission. And I told him about the abuse are going on missions and I was not ladid about why I felt I couldn't go on a mission. And I told him about the abuse are going on missions and I was not ladid about why I felt I couldn't go on a mission. And I told him about the abuse are going on missions and I was not ladid about why I felt I couldn't go on a mission.	15	Q	So you were attending BYU at the time?	1		
18 A Utah Technical College. 19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough credits to get a degree? Put it that way. 18 A I told him that I didn't think I would be able to go on a mission, but my friends were going on missions and I was in the total friends. So in that discussion, we talked about why I felt I couldn't go on a mission. And I told him about the abus 4 I was not I don't recall being very detailed, other than to say that I was abused by Jack for many years. And I	16			ł		
19 Q Have you ever attended BYU? 20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough 24 credits to get a degree? Put it that way. 29 mission, but my friends were going on missions and I was not and I to so in that discussion, we talked about why I felt I couldn't go on a mission. And I told him about the abuse 22 Q How detailed were you with him? 23 A I was not I don't recall being very detailed, other than to say that I was abused by Jack for many years. And I	17	Q		E .		
20 A No. 21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough 24 credits to get a degree? Put it that way. 20 to. So in that discussion, we talked about why I felt I 21 couldn't go on a mission. And I told him about the abus 22 Q How detailed were you with him? 23 A I was not I don't recall being very detailed, other than 24 to say that I was abused by Jack for many years. And I	18			l .	A	I told him that I didn't think I would be able to go on a
21 Q Did you complete your studies at Utah Technical? 22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough 24 credits to get a degree? Put it that way. 21 couldn't go on a mission. And I told him about the abus 22 Q How detailed were you with him? 23 A I was not I don't recall being very detailed, other that 24 to say that I was abused by Jack for many years. And I	19	Q				mission, but my mends were going on missions and I wanted
22 A I did not leave with a degree. 23 Q But did you complete your studies? Did you get enough 24 credits to get a degree? Put it that way. 22 Q How detailed were you with him? 23 A I was not I don't recall being very detailed, other that to say that I was abused by Jack for many years. And I	20					to. So in that discussion, we taked about why first I
23 Q But did you complete your studies? Did you get enough 24 credits to get a degree? Put it that way. 23 A I was not I don't recall being very detailed, other than to say that I was abused by Jack for many years. And I	21	Q		1	_	
24 credits to get a degree? Put it that way. 24 to say that I was abused by Jack for many years. And I	1		I did not leave with a degree.	1		
24 credits to get a degree? Put it that way.	I	Q		l .	А	1 was not 1 don't recan being very detailed, outer than
ac Cale at at at the at annual discount ma from my mission	24			į.		felt that that would keep me from my mission.
25 A No. 25 felt that that would keep me from my mission.	25	A	No.	23		ich mat mat would keep me nom my mission.

					D 24
		Page 22			Page 24
1	Q	Did you express to him that as a result of this abuse you	1	A	I can't say that that's a fair statement.
2		felt that perhaps you weren't worthy, as that term was used	2	Q	Can you remember any journal entries, then, in which you
3		in the church? Is that correct?	3		discussed or
4	A	Correct.	4	A	I don't recall any journal entries of which I discussed that. I do recall journal entries of you know, I don't
5	Q	And what else did you describe? Anything beyond that as	5		recall any journal entries. I do, however, know that my
6		far as how your feelings were, why you couldn't serve on a	6 7		goal was to try to focus on being the best missionary.
7		mission?	8	Q	Did you complete your mission?
8	Α	That I felt guilty and unworthy. Those are the two best terms I could think of that I told him.	9	A	Yes.
9	^	Did you tell him that it affected you in any other ways	10	Q	Do you believe you successfully completed your mission?
10	Q	that might impact your serving as a missionary?	11	Ā	Yes.
11 12	Α	I don't recall.	12	Q	Upon your return from that mission, my understanding is,
13	Q	As a result of that, what did the bishop advise you?	13	`	you again spoke with your bishop, and you believe it was
14	A	The bishop told me the bishop apologized to me. And he	14		Bishop Hoisington; is that correct?
15	11	said that they thought that they had taken care of the	15	Α	Hoisington.
16		problem with Jack Loholt years ago. They had sent him to	16	Q	And what did you tell him when you returned?
17		some treatment, thought things were taken care of, put him	17	Α	I don't recall what I told him, but I believe that through
18		back in the Scouts because they thought that's where he	18		our discussion, I was things were set up to where I
19		would be best served serving.	19		could receive some counseling.
20	Q	Now again, this was bishop	20	Q	Mr. Denison, as far as you knew, was a at least licensed
21	A	Pettit.	21		or qualified counselor with LDS Social Services; is that
22	Q	Pettit was telling you this? All right. Did he explain to	22		correct?
23		you that the abuse you had suffered did not make you	23	A	
24		unworthy or did not in any way prohibit you from serving as	24	Q	As far as you knew? Okay. In your meetings and discussions with him, did you go over how you felt at the
25		a missionary?	25		discussions with firm, and you go over now you ten at the
<u> </u>		Page 23			Page 25
,	Α	I don't recall all that he said back then, but I do know	1		time, both as to any guilt you had or any of the other
	М	that I did serve a mission, and so I believe that he	1		
1 2			1 4		problems that you felt were associated with the abuse?
2		perhaps tried to comfort me in saving it wasn't my fault.	2 3	Α	problems that you felt were associated with the abuse? I don't recall, really, any of my discussions with him,
3	O	perhaps tried to comfort me in saying it wasn't my fault.	3 4	A	I don't recall, really, any of my discussions with him, because it was so long ago.
3 4	Q	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by	3	A Q	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told
3 4 5		perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else?	3 4		I don't recall, really, any of my discussions with him, because it was so long ago.
3 4	A	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall.	3 4 5		I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue.
3 4 5 6		perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else?	3 4 5 6	Q	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions?
3 4 5 6 7	A Q A	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted?	3 4 5 6 7	Q A Q A	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse.
3 4 5 6 7 8	A Q	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons.	3 4 5 6 7 8 9	Q A Q	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing
3 4 5 6 7 8 9	A Q A Q	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of	3 4 5 6 7 8 9 10	Q A Q A	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in
3 4 5 6 7 8 9 10	A Q A Q A	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of any abuse?	3 4 5 6 7 8 9 10 11 12	Q A Q A	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in resolving the issues of your abuse and the effect it had
3 4 5 6 7 8 9 10	A Q A Q A	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of any abuse? I don't know that, and I I do recall him asking me, do	3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in resolving the issues of your abuse and the effect it had upon you?
3 4 5 6 7 8 9 10 11 12	A Q A Q A	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of any abuse? I don't know that, and I I do recall him asking me, do you know if my sons were abused.	3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in resolving the issues of your abuse and the effect it had upon you? I felt like I had resolved the issue as far as the guilt.
3 4 5 6 7 8 9 10 11 12 13	A Q A Q A	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of any abuse? I don't know that, and I I do recall him asking me, do you know if my sons were abused. I assume you told him you didn't know; is that correct?	3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in resolving the issues of your abuse and the effect it had upon you? I felt like I had resolved the issue as far as the guilt. Okay.
3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A Q A	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of any abuse? I don't know that, and I I do recall him asking me, do you know if my sons were abused. I assume you told him you didn't know; is that correct? That's correct.	3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A Q	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in resolving the issues of your abuse and the effect it had upon you? I felt like I had resolved the issue as far as the guilt. Okay. And then it was put to rest.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A Q A Q	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of any abuse? I don't know that, and I I do recall him asking me, do you know if my sons were abused. I assume you told him you didn't know; is that correct? That's correct. Was your mission delayed at all because of this disclosure	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q A Q A Q A Q	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in resolving the issues of your abuse and the effect it had upon you? I felt like I had resolved the issue as far as the guilt. Okay. And then it was put to rest. The guilt was put to rest or what was put to rest?
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A Q	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of any abuse? I don't know that, and I I do recall him asking me, do you know if my sons were abused. I assume you told him you didn't know; is that correct? That's correct. Was your mission delayed at all because of this disclosure to Bishop Pettit?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in resolving the issues of your abuse and the effect it had upon you? I felt like I had resolved the issue as far as the guilt. Okay. And then it was put to rest. The guilt was put to rest or what was put to rest? And the whole ordeal. I just I had come to know that it
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Q A Q A Q A Q A Q	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of any abuse? I don't know that, and I I do recall him asking me, do you know if my sons were abused. I assume you told him you didn't know; is that correct? That's correct. Was your mission delayed at all because of this disclosure to Bishop Pettit? No.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q A Q A Q A Q	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in resolving the issues of your abuse and the effect it had upon you? I felt like I had resolved the issue as far as the guilt. Okay. And then it was put to rest. The guilt was put to rest or what was put to rest? And the whole ordeal. I just I had come to know that it wasn't my fault, that I wasn't at guilt, and I put it in
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of any abuse? I don't know that, and I I do recall him asking me, do you know if my sons were abused. I assume you told him you didn't know; is that correct? That's correct. Was your mission delayed at all because of this disclosure to Bishop Pettit? No. Your counsel has furnished us with your journal from the	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q A Q A Q	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in resolving the issues of your abuse and the effect it had upon you? I felt like I had resolved the issue as far as the guilt. Okay. And then it was put to rest. The guilt was put to rest or what was put to rest? And the whole ordeal. I just — I had come to know that it wasn't my fault, that I wasn't at guilt, and I put it in the back of my mind and said now, you need to try to move
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A Q A Q	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of any abuse? I don't know that, and I I do recall him asking me, do you know if my sons were abused. I assume you told him you didn't know; is that correct? That's correct. Was your mission delayed at all because of this disclosure to Bishop Pettit? No. Your counsel has furnished us with your journal from the time that you served as a missionary, and in reading that	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q A Q A Q A A Q A	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in resolving the issues of your abuse and the effect it had upon you? I felt like I had resolved the issue as far as the guilt. Okay. And then it was put to rest. The guilt was put to rest or what was put to rest? And the whole ordeal. I just I had come to know that it wasn't my fault, that I wasn't at guilt, and I put it in the back of my mind and said now, you need to try to move on.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A Q	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of any abuse? I don't know that, and I I do recall him asking me, do you know if my sons were abused. I assume you told him you didn't know; is that correct? That's correct. Was your mission delayed at all because of this disclosure to Bishop Pettit? No. Your counsel has furnished us with your journal from the time that you served as a missionary, and in reading that journal, I did not notice any entries in which you spoke of	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in resolving the issues of your abuse and the effect it had upon you? I felt like I had resolved the issue as far as the guilt. Okay. And then it was put to rest. The guilt was put to rest or what was put to rest? And the whole ordeal. I just I had come to know that it wasn't my fault, that I wasn't at guilt, and I put it in the back of my mind and said now, you need to try to move on. And did you, in fact as far as you are concerned, were
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A Q	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of any abuse? I don't know that, and I I do recall him asking me, do you know if my sons were abused. I assume you told him you didn't know; is that correct? That's correct. Was your mission delayed at all because of this disclosure to Bishop Pettit? No. Your counsel has furnished us with your journal from the time that you served as a missionary, and in reading that journal, I did not notice any entries in which you spoke of having any difficulties or problems serving as a missionary	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in resolving the issues of your abuse and the effect it had upon you? I felt like I had resolved the issue as far as the guilt. Okay. And then it was put to rest. The guilt was put to rest or what was put to rest? And the whole ordeal. I just I had come to know that it wasn't my fault, that I wasn't at guilt, and I put it in the back of my mind and said now, you need to try to move on. And did you, in fact as far as you are concerned, were you able to move on?
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A Q	perhaps tried to comfort me in saying it wasn't my fault. Did you ask at that time for any help from the church by way of any counseling or anything else? I don't recall. And was Bishop Pettit a man that you trusted? Yes. Did you know his son, by the way? I knew several of his sons. Do you know whether any of his sons had been the subject of any abuse? I don't know that, and I I do recall him asking me, do you know if my sons were abused. I assume you told him you didn't know; is that correct? That's correct. Was your mission delayed at all because of this disclosure to Bishop Pettit? No. Your counsel has furnished us with your journal from the time that you served as a missionary, and in reading that journal, I did not notice any entries in which you spoke of	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A A Q A	I don't recall, really, any of my discussions with him, because it was so long ago. So you're telling me today, you don't know what you told him or what you discussed with him during these sessions? I just know that it revolved around that issue. And what do you mean by "that issue"? The abuse. The abuse? Okay. At the time you stopped seeing Mr. Denison, did you feel you had progressed at all in resolving the issues of your abuse and the effect it had upon you? I felt like I had resolved the issue as far as the guilt. Okay. And then it was put to rest. The guilt was put to rest or what was put to rest? And the whole ordeal. I just I had come to know that it wasn't my fault, that I wasn't at guilt, and I put it in the back of my mind and said now, you need to try to move on. And did you, in fact as far as you are concerned, were

1 A I moved on in as normal of a fashion as I could, or as I thought was normal. 2 thought was normal. 3 Q I want to go hack for a minute. With regard to the abuse that cocurred in your family towards your mother, the physical baluse, what happened to her? What type of abuse than that? 3 A I winesed my father hit her. 4 Q I m what fashion? 5 Q I m what fashion? 6 M Was there scoreding about that job; it was Just that I didn't feel like I could manage or take care of my responsibilities there with the way? I feel. 5 Q I m what fashion? 6 M Was there scoreding about that job it was year to the care of my responsibilities there with the way? I feel. 5 Q I m what fashion? 6 M Was there scoreding about that job it hat job it was a fer you response to that it is a fash of the could manage or take care of my responsibilities there with the way? I feel. 5 Q I m what fashion? 6 M Was there scoreding about that job it hat job it was a fer you response to the physically response to the care of my responsibilities there with the way? I feel. 6 M Was there scoreding about that job it was a fer you were such as Just the first the first of the could manage or take care of my responsibilities there with the way? I feel. 6 Q A most a support section in the mad 90s and was when it was, but it was a fer you extended from your exect, any further help with counseling from any your exect, any further help with counseling from any your exect, any further help with counseling from any your exect, any further help with counseling from any your exect, any further help with counseling from any your exect, any further help with counseling from any your exect, any further help with counseling from any your exect, any further help with counseling from any your exercise, any further help with counseling from any your exercise, any further help with counseling from any your exercise, any further help with counseling from any your exercise, any further help with counseling from any your exercise, any further help with counseling from any your			Page 26			Page 28
thought was normal 1 Vant to go back for a minute. With regard to the abuse that occurred in your family towards your mother, the physical abuse, what happened to her? What type of abuse did you witness? 7 A I winnessed my father this trace. 9 In what fashion? I mean, can you be a little more precise than that? 10 A In what fashion? 11 Q Well, I mean, did he strike her on the face, did he lock her, did he - how did he physically - well, what happened, as you remember it? 12 know my sister polled us into another room, I know they were fighting. 13 A In what set the time? 14 A I can't answer that question. I know that it happened, I know that the time? 15 A Correct. 16 Vay Sury father, biological father, again, was he a member of the church at the time? 17 A No. 18 O And that is where, in Black Diamond? 19 A No. one of us were. 10 Q And that is where, in Black Diamond? 21 A Black Diamond. 22 Q And how long have you been there? 23 A About a week and a bair. 24 Q I mimeldately before that, you worked for whom? 25 A Palmer Coking Coal. 26 Page 27 27 A Yes. What is your current capacity with the Kent School District. 27 Q And how long have you been there? 28 Q What is your current capacity with the Kent School District. 29 Q What was your job there? 30 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whave it is? 10 A Pin a custodian. 11 Q You were a custidian before, were you nor? 12 A Yes. 13 Q Why did you go back to the Kent School District. 14 O You were a custidian before, were you nor? 15 A No. 16 Q Were you dismissed or fired from the Palmer Company. 17 A Yes. 18 Q Were you dismissed or fired from the Palmer Company. 19 A No. 20 Q What was your job there? 21 A I look care of accounts receivable, collections, customer the palmer Coking Coal Company, or Coal Coking Company. 22 A Baccase it is the least stressful piace I could find to work. 23 A Robot the week and a bair, you worked for them? 24 A Plant coking C	1	Δ	I moved on in as normal of a fashion as I could, or as I	1	Q	Was there something about that job that was stressful?
1		Л		2	À	I don't believe it was something about that job; it was
that occurred in your family towards your mother, the physical bause, what happened to her? What type of abuse did you witness? A I witnessed my father hit her. Q In what fashion? I mean, can you be a little more precise than that? A I witnessed my father hit her. Well, I mean, did he strike her on the face, did he kick her, did he — how did he physically — well, what happened, as you remember it? A I cart answer that question. I know that it happened, I know my sister pulled us into another room, I knew they were fighting. A No. Correct. A O You've currently working where? A A board aweck and a half. A Correct. A A board aweck and a half. A A chart as were find you been there? A A how how long have you been there? A A board aweck and a half. A I mendiately before that, you worked for whom? A Black Diamond. B G And that is where, in Black Diamond? A I Mendish, approximately B G Wers you dismissed of fire them? A I downoths, approximately B G What is your current capacity with the Kent School District? A Palmer Coking Coal Company, you had worked for them? A Palmer Coking Coal Company, you had worked for work. B Q What is your current capacity with the Kent School District? A No. B Q Ware you dismissed or fired from the Palmer Company? Whatever it is? A Because it is the least stressful place I could find to work what care it is a Beause it is the least stressful place I could find to work and early on the palmer Coking Coal Company, you had worked for the whatever it is? A No. B Q Were you dismissed or fired from the Palmer Company? A No. B Q Were you dismissed or fired from the Palmer Company? A No. B Q Were you dismissed or fired from the Palmer Company? A No. B Q Were you dismissed or fired from the Palmer Company? A No. B Q Were you dismissed or fired from the Palmer Company, of hy the way? B A Courted that received he company and the received he company and provides and ends around that needed to be fixed around the company		0	I want to go back for a minute. With regard to the abuse	3		just that I didn't feel like I could manage or take care of
bysical sbuse, what happened to her? What type of abuse did you witness? A I witnessed my father hit her. I witnessed my father hit her. A I witnessed my father hit her. A I witnessed my father hit her. What fashion? What fas		~	that occurred in your family towards your mother, the	4		
did you writness? A I witnessed my father hit her. B Q In what fashion? I mean, can you be a hittle more precise than that? A I own what fashion? I mean, can you be a hittle more precise than that? Well, I mean, did he strike her on the face, did he kick ber, did he — how did he physically — well, what is happened, as you remember it? A I cart answer that question. I know that it happened, I know my sister pulled us into another room, I knew they were fighting. Was your fisher, biological father, again, was he a member of the church at the time? A No. none of us were. D Q Was your fisher, biological father, again, was he a member of the church at the time? A No. none of us were. D Q You're currently working where? A A how long have you been there? A A how long have you been there? A Palmer Coking Coal. Page 27 A Mal hat is where, in Black Diamond? A I amendist, approximately. B G What is your current capacity with the Kent School District, and it you were a custodian before, were you not? A Yes. D Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadft you? A Yes. D What is your current capacity with the Kent School District? A Yes. D What is your current capacity with the Kent School District? A Yes. D Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? A Recase it is the least stressful place I could find to work. B Q Wray out dismissed or fired from the Palmer Company? A No. D Wray out dismissed or fired from the Palmer Company? A No. C Wray out dismissed or fired from the Palmer Company? A No. C Wray out dismissed or fired from the Palmer Company? A No. C Wray out dismissed or fired from the Palmer Company? A No. C Wray out dismissed or fired from the Palmer Company? A No. C Wray out dismissed or fired from the Palmer Company? A No. C What was your job there? A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed dods and ends around that ne			physical abuse, what happened to her? What type of abuse	5	Q	After you saw Mr. Denison in the mid '80s we don't know
7 A I witnessed my father hit her. 8 Q In what fashion? I mean, can you be a little more precise than that? 9 A In what fashion? I mean, can you be a little more precise than that? 10 A In what fashion? 11 Q Well, I mean, did he strike her on the face, did he kick her, did he – how did he physically – well, what happened, 1 lash happened, as you remember it? 14 A I can't answer that question. I know that it happened, 1 lash work sister pulled us into another room, I knew they were fighting were fighting. 17 Q Was your father, biological father, again, was he a member of the church at the time? 18 A No, none of us were. 19 A No, none of us were. 20 Q You've currently working where? 21 A No, none of bus were. 22 A About a week and a half. 23 A About a week and a half. 24 Q Immediately before that, you worked for whom? 25 A Palmer Coking Coal. 26 A Man that is where, in Black Diamond? 27 A Yes. 28 Q Wath is your current capacity with the Kent School District, hadn't you? 29 A Very ou dismissed or fired from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 30 Q What is your current capacity with the Kent School District? 31 Q Were you dismissed or fired from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 31 Q Were you dismissed or fired from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 31 Q Were you dismissed or fired from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 32 Q What was your job there? 33 A Because it is the least stressful place I could find to work whatever it is? 34 Q Were you dismissed or fired from the Palmer Coking Company, or Coal Coking Company, whatever it is? 35 Q What was your job there? 36 Q What was your job there? 37 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company? 36 Q What was your job there? 37 A I took care of accounts receivable, collections, customer service				6		exactly when it was, but it was after you returned from
s Q In what fashion? I mean, can you be a little more precise than that? 10 A In what fashion? 11 Q Well, I mean, did he strike her on the face, did he kick her, how did he physically well, what happened, as you remember it? 13 happened, as you remember it? 14 A I can't answer that question. I know that it happened, I know my sister pulled us into another room, I knew they were fighting. 15 know my sister pulled us into another room, I knew they were fighting. 16 was your father, biological father, again, was he a member of the church at the time? 18 of the church at the time? 19 A No, none of us were. 20 Q You're currently working where? 21 A Kent School District. 22 Q And how long have you been there? 23 A About a week and a half. 24 Q Immediately before that, you worked for whom? 25 A Palmer Coking Coal. 26 A No. 27 A Pes. 28 Q What is your current capacity with the Kent School District, hadn't you? 29 A No, were a custodian before, were you not? 20 Q What was your job there? 21 A Because it is the least stressful place I could find to workeever it is? 29 A No were a custodian before, were you not? 20 Q What was your job there? 21 A Because it is the least stressful place I could find to workeever, you dismissed or fired from the Palmer Coking Coal Company, or Coal Coking Company, or and counts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 29 Q What was your job there? 20 Q What was your job there? 21 A Because it is the least stressful place I could find to workey of every ou dismissed or fired from the Palmer Coking Coal Company, or coal Coking Coal Company, or coal Coking Coal Company, or c		Α		7		your mission in '83 after you stopped seeing him, did
than that? A In what fashion? In what is therman? Is hat correct? In what fashion? In what fashio			In what fashion? I mean, can you be a little more precise	8		you ever seek any further help with counseling from any
1		`				
11 Q Well, I mean, did he strike her on the face, did he kick her, did he — how did he physically — well, what happened, as you remember it? 14 A I can't answer that question. I know that it happened, I know my sister pulled us into another room, I knew they were fighting. 15 know my sister pulled us into another room, I knew they were fighting. 16 was your father, biological father, again, was he a member of the church at the time? 17 Q Was your father, biological father, again, was he a member of the church at the time? 18 A No, none of us were. 19 A No, none of us were. 20 A you're currently working where? 21 A About a week and a half. 22 Q And that is where, in Black Diamond? 23 A About a week and a half. 24 Q Immediately before that, you worked for whom? 25 A Black Diamond. 26 A Black Diamond. 27 A Yes. 28 Q What is your current capacity with the Kent School District? 29 Before the Palmer Coking Coal Company, you had worked for the Kent School District? 20 A Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 29 A Planer Coking Coal Company, or Coal Coking Company, whatever it is? 30 Q What is your current capacity with the Kent School District? 31 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 31 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 31 Q Were you dismissed or fired from the Palmer Company? 32 A No. 33 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 31 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 32 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 33 Q Why did you go back to the Kent School District from th	ł	Α	In what fashion?	10		•
happened, as you remember it? A I can't answer that question. I know that it happened, I ls that correct? know my sister pulled us into another room, I knew they were fighting. Was your father, biological father, again, was he a member of the church at the time? of the church at the time? A No, none of us were. Yes a Vore currently working where? A About a week and a half. I minediately before that, you worked for whom? A Black Diamond. A Ham down long have you been there? A Black Diamond. A Ham onths, approximately. B Before the Palmer Coking Coal Company, you had worked for the Kent School District? A Yes. Q What is your current capacity with the Kent School District? A Yes. Q Why dif you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? A Yes. Q Why dif you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? A Yes. Q Why dif you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? A Yes. Q Why dif you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? A Yes. Q Why dif you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? A Yes. Q Why dif wow you dismissed or fired from the Palmer Company? No. Q Were you dismissed or fired from the Palmer Company? A No. You were a custodian before, were you not? A Yes. A No. You was the torrect? A Correct. A Correct. A Correct. A Correct. That's corr	11	Q	Well, I mean, did he strike her on the face, did he kick			
A Carret answer that question. 1 know that it happened, I know my sister pulled us into another room, I knew they were fighting. Was your father, biological father, again, was he a member of the church at the time? No, none of us were. You're currently working where? A No, none of us were. A About a week and a half. A About a week and a half. Page 27 A About a week and a half. Page 27 A About a week and a half. A I A menths, approximately. B Black Diamond. A Ha months, approximately. B Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? A Yes. What is your current capacity with the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, or Coal	12	•	her, did he how did he physically well, what		Q	
know my sister pulled us into another room, I knew they were fighting. No. none of us were.	13		happened, as you remember it?			
Name with space plants and was the amount of the church at the time? Was your father, biological father, again, was he a member of the church at the time? No, none of us were. No, none of us were. A No, none of us were. A About a week and a half. A About a week and a half. Palmer Coking Coal. Page 27 A Black Diamond. How long had you worked for them? A Had months, approximately. Before the Palmer Coking Coal Company, you had worked for the Kert School District, hadn't you? A Pyes. What is your current capacity with the Kent School District, hadn't you? A Pres. Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, worked it in work. Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Coal Company, or Coal Coking Coal Company, or Coal Coking Coal Company, or Coal Co	14	Α				
17 Q Was your father, biological father, again, was he a member of the church at the time? 18 A No, none of us were. 20 Q You're currently working where? 21 A Kent School District. 22 Q And how long have you been there? 23 A About a week and a half. 24 Q Immediately before that, you worked for whom? 25 A Palmer Coking Coal. Page 27 1 Q And that is where, in Black Diamond? 2 A Black Diamond. 3 Q How long had you worked for them? 4 A 14 months, approximately. 5 Q Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? 4 A Yes. 8 Q What is your current capacity with the Kent School 9 District? 9 Q What dis your current capacity with the Kent School 11 Q You were a custodian. 12 Q You were a custodian before, were you not? 13 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 16 A Because it is the least stressful place I could find to work. 17 Q Were you dismissed or fired from the Palmer Company? 18 A No. 19 Q What was your job there? 20 And in reviewing those records from '97 until sometime in 2 200 cr 3 or something like that, you had various issues that you were seeing her for relating to your relationship with your partner; is that correct? 22 A That's correct. 23 Q Did you ever discuss with her anything to do with your abuse was mot an issue the in your partner; is that correct? 24 A No. 25 A No. 26 Is it fair for me to assume that your abuse was not an issue then in your life? 36 MR. KOSNOFF: Form of the question. Which time period are you referring to the time period are you referring to the prior. 39 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company. 30 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company. 31 Page 29 32 Q What was your job there? 33 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company. 31 Page 29 4 No.	15		know my sister pulled us into another room, I knew they			
from the church at the time? 8	16				-	
19 A No, none of us were. 20 Q You're currently working where? 21 A Kent School District. 22 Q And how long have you been there? 23 A About a week and a half. 24 Q Immediately before that, you worked for whom? 25 A Palmer Coking Coal. Page 27 1 Q And that is where, in Black Diamond? 2 A Black Diamond. 3 Q How long had you worked for them? 4 A 14 months, approximately. 5 Q Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? 7 A Yes. 8 Q What is your current capacity with the Kent School 9 District? 10 Q Fore the Palmer Coking Coal Company, or Coal Coking Company, 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, 15 whatever it is? 16 A Because it is the least stressful place I could find to work. 17 What was your job there? 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 21 Q What does that you were a custod to he fixed around the company. 22 What does that you were seeing her for relatings to your relationship with your partner; is that correct? 22 A That's correct. 23 A That's correct. 24 Did you ever discuss with her anything to do with your abuse was not an issume. 25 A No. 26 Page 29 27 A No. 28 Page 29 29 A No. 29 A No. 30 Is it fair for me to assume that your abuse was not an issue then in your life? 4 No. 4 Is if fair for me to assume that your abuse was not an issue then in your life? 4 No. 5 (Is if fair for me to assume that your abuse was not an issue then in your life? 4 No. 5 (Is if fair for me to assume that your abuse was not an issue then in your life? 5 (Is if fair for me to assume that your life? 6 MR. KOSNOFF: Form of the question. Which time periods. 9 (Is Mr. Frey) From when you first saw her with	17	Q				*
20 Q You're currently working where? 21 A Kent School District. 22 Q And how long have you been there? 23 A About a week and a half. 24 Q Immediately before that, you worked for whom? 25 A Palmer Coking Coal. 26 Page 27 1 Q And that is where, in Black Diamond? 27 A Black Diamond. 28 Q How long had you worked for them? 39 Q And that is where, in Black Diamond? 40 A Black Diamond. 41 H months, approximately. 42 A Yes. 43 Q What is your current capacity with the Kent School District, hadn't you? 44 A Yes. 45 Q What is your current capacity with the Kent School District? 46 Q You were a custodian before, were you not? 47 A Yes. 48 Q What is your current capacity with the Kent School District? 49 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, worked for the Palmer Coking Coal Company, or Coal Coking Company, or Coal Company, or Coal Coking Company, or Coal Coking Company, or Coal Coal Company, or Coal Coal Coal Coal Coal Coal Coal Coal	18				Q	
A Kent School District. 2 Q And how long have you been there? 2 A About a week and a half. 2 Q Immediately before that, you worked for whom? 2 A Palmer Coking Coal. Page 27 Page 27 Page 29 1 Q And that is where, in Black Diamond? 2 A Black Diamond. 3 Q How long had you worked for them? 4 A 14 months, approximately. 5 Q Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? 7 A Yes. 9 Q What is your current capacity with the Kent School 9 District? 10 Q You were a custodian before, were you not? 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 14 A Because it is the least stressful place I could find to work. 15 Q Were you dismissed or fired from the Palmer Company? 16 A Because it is the least stressful place I could find to work. 17 Q What was your job there? 18 Q What was your job there? 19 A No. 20 What was your job there? 21 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 21 A What does that company do, by the way? 22 What does that company do, by the way? 23 Why the your partner; is that correct? 24 That's correct. 25 A No. 26 A Did you ever discuss with her anything to do with your abuse was not an issue then in your discuss with her anything to do with your abuse was not an issue then in your discuss then in your life? A No. 1 Q — during that time period, at least? A No. 1 S if fair for me to assume that your abuse was not an issue then in your life? A No. 1 S with your partner; is that correct? 1 That's correct. 1 A No. 1 Q — during that time period, at least? A No. 1 S if fair for me to assume that your abuse was not an issue then in your life? MR. KOSNOFF: Form of the question. Which time periods. 9 Q Why were a custodian before, were you not? 10 Q Wh	19	Α	*			
2 And how long have you been there? 2 A About a week and a half. 2 Immediately before that, you worked for whom? 2 A Palmer Coking Coal. Page 27 1 Q And that is where, in Black Diamond? 2 A Black Diamond. 3 Q How long had you worked for them? 4 A 14 months, approximately. 5 Q Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? 6 What is your current capacity with the Kent School District? 7 A Yes. 8 Q What is your current capacity with the Kent School District? 9 District? 1 Q You were a custodian before, were you nor? 11 Q You were a custodian before, were you nor? 12 A Yes. 9 Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 1 A Because it is the least stressful place I could find to work. 1 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 2 Q What does that company do, by the way? 2 A No. 3 Q Is it fair for me to assume that your abuse was not an issue then in your life? 4 A No. 4 If m a custodian. 5 Q Weney our current capacity with the Kent School District from the meant of the palmer Coking Coal Company, or Coal Coking Company, whatever it is? 4 A Because it is the least stressful place I could find to work. 5 Q What was your job there? 6 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 2 Q What does that company do, by the way? 2 What does that company do, by the way? 2 A No. 3 Q Is it fair for me to assume that your abuse was not an issue then in your disease. 4 No. 5 MR. KOSNOFF: Form of the question. Which time period, at least? A No. 6 G MR. FREY: From 1997 until	20	Q	•			<u> </u>
23 Q Did you ever discuss with her anything to do with your abuse 25 A Palmer Coking Coal. 26 Page 27 Page 27 Page 27 Page 27 Page 29 1 Q And that is where, in Black Diamond? 2 A Black Diamond. 3 Q How long had you worked for them? 4 A 14 months, approximately. 5 Q Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? 6 What is your current capacity with the Kent School 7 A Yes. 8 Q What is your current capacity with the Kent School 9 District? 9 What is your current capacity with the Kent School 11 Q You were a custodian. 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 16 A Because it is the least stressful place I could find to work. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 10 Q What was your job there? 21 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 25 A No. 26 Did you ever discuss with her anything to do with your abuse was not an issue then in your elastiss; with time period, at least? 2 A No. 28 Page 29 Page 29 Page 29 Page 29 RR. GOSNOFF: Form of the question. Which time period are you referring to? MR. FREY: From 1997 until MR. KOSNOFF: Well, there were two distinct time periods. 26 (By Mr. Frey) From when you first saw her with regard to the relationship the break up of your relationship with your partner up until sometime and I can get the exact date; well confirm the date but I think the first entry is sometime in June of perhaps 2002, but I'll confirm that. 27 You saw her on two separate occasions starting in '97, did you not? 28 A In the first Q You saw her on two separate occasions starting in '97, did you not? 39 You saw her on two separate occasions starting in '97, did you not? 40 Yo	ŧ			ļ.		· ·
24 Q Immediately before that, you worked for whom? 25 A Palmer Coking Coal. Page 27 Page 27 Page 27 Page 29 1 Q And that is where, in Black Diamond? 2 A Black Diamond. 3 Q How long had you worked for them? 4 A 14 months, approximately. 5 Q Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? 7 A Yes. 8 Q What is your current capacity with the Kent School 9 District? 10 A I'm a custodian. 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 14 A Because it is the least stressful place I could find to work. 15 A Because it is the least stressful place I could find to work. 16 Q Where you dismissed or fired from the Palmer Company? 17 A No. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 25 A No. 26 A During that time period, at least? 27 A No. 28 Q - during that time period, at least? 29 A No. 3 Q Is it fair for me to assume that your abuse was not an issue then in your life? 4 No. 4 No. 5 MR. KOSNOFF: Form of the question. Which time period are you referring to? 4 MR. KOSNOFF: Well, there were two distinct time periods. 4 MR. KOSNOFF: Well, there were two distinct time periods are then in your fire? 4 MR. KOSNOFF: Well, there were two distinct time periods are then in your fire? 5 MR. KOSNOFF: Well, there were two distinct time periods are then in your fire? 6 MR. KOSNOFF: Well, there were two distinct time periods are then in your fire? 6 MR. KOSNOFF: Well, there were two distinct time periods are then in your fire? 6 MR. KOSNOFF: Well, there were two distinct time periods are then in your fire? 6 MR. FREY: From 1997 until	i	-	And how long have you been there?			
Page 27 Page 29 And that is where, in Black Diamond? A Black Diamond. Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? What is your current capacity with the Kent School District? A I'm a custodian. Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? A Blecause it is the least stressful place I could find to work. What was your job there? A I took care of accounts receivable, collections, customer service, order entry, running the scale house, itsed odds and ends around that needed to be fixed around the company. Page 27 Page 29 A No. Page 29 A No. I Q - during that time period, at least? A No. I tair for me to assume that your abuse was not an issue then in your life? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF:					Ų	•
Page 27 1 Q And that is where, in Black Diamond? 2 A Black Diamond. 3 Q How long had you worked for them? 4 A 14 months, approximately. 5 Q Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? 6 What is your current capacity with the Kent School 8 MR. KOSNOFF: Form of the question. Which time period are you referring to? 7 A Yes. 8 Q What is your current capacity with the Kent School 8 MR. KOSNOFF: Well, there were two distinct time periods. 9 District? 10 A I'm a custodian. 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 14 A Because it is the least stressful place I could find to work. 15 A Because it is the least stressful place I could find to work. 16 Q Were you dismissed or fired from the Palmer Company? 17 A No. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 25 A No. 26 Q What does that it fire me to assume that your abuse was not an issue then in your life? 26 A No. 3 Q Is fit fair for me to assume that your abuse was not an issue then in your dissue then in your life? 3 A No. 3 Q Is fit fair for me to assume that your abuse was not an issue then in your fissue then in your fisue the in your fissue then in your fissue then in your fissue the		-			Λ	·
1 Q And that is where, in Black Diamond? 2 A Black Diamond. 3 Q How long had you worked for them? 4 A 14 months, approximately. 5 Q Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? 7 A Yes. 8 Q What is your current capacity with the Kent School 9 District? 10 A I'm a custodian. 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 14 Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 15 A Because it is the least stressful place I could find to work. 16 Q Were you dismissed or fired from the Palmer Company? 17 A No. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 25 A No. 26 Q What the in your iffe? 26 A No. 3 Q Is it fair for me to assume that your abuse was not an issue then in your life? 4 A No. 4 No. 5 MR. KOSNOFF: Form of the question. Which time periods are you referring to? 4 MR. KOSNOFF: Well, there were two distinct time periods are you referring to? 4 MR. KOSNOFF: Well, there were two distinct time periods are you referring to? 4 MR. KOSNOFF: Well, there were two distinct time periods. 5 MR. KOSNOFF: Form of the question. Which time periods are you referring to? 6 MR. KOSNOFF: Well, there were two distinct time periods. 6 (By Mr. Frey) From when you first saw her with regard to the relationship the break up of your relationship with your partner up until sometime and I can get the exact date; we'll confirm the date but I think the first entry is assometime in June of perhaps 2002, but I'll confirm that. 15 A It the first 16 Q You saw her on two separate occasions starting in '97, did you not? 17 you not? 18 A In '97, I went	25	Α	Palmer Coking Coal.	22	А	110.
A Black Diamond. 3 Q How long had you worked for them? 4 A 14 months, approximately. 5 Q Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? 7 A Yes. 8 Q What is your current capacity with the Kent School 9 District? 10 A I'm a custodian. 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, or Watever it is? 16 A Because it is the least stressful place I could find to work. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 11 Look care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 21 Q What does that company do, by the way? 22 A No. 3 Q Is it fair for me to assume that your abuse was not an issue then in your life? 4 No. 3 Q Is it fair for me to assume that your abuse was not an issue then in your life? 4 No. 8 Palmer Coking Coal Company, you had worked for the Kent School District from the time period are you referring to? 4 MR. KOSNOFF: Form of the question. Which time period are you referring to? 5 MR. KOSNOFF: Well, there were two distinct time periods. 6 (By Mr. Frey) From when you first saw her with regard to the relationship the break up of your relationship with your partner up until sometime and I can get the exact date; we'll confirm the date but I think the first entry is sometime in June of perhaps 2002, but I'll confirm that. 15 A It the first 16 Q You saw her on two separate occasions starting in '97, did you not? 18 A In '97, I went to see her regarding some relationship issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your documents, how long I saw her. And then I did not return to her until 2003. And that's when I returned to her in regard to the abuse.			Page 27			Page 29
A Black Diamond. 3 Q How long had you worked for them? 4 A 14 months, approximately. 5 Q Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? 7 A Yes. 8 Q What is your current capacity with the Kent School 9 District? 10 A I'm a custodian. 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, or Watever it is? 16 A Because it is the least stressful place I could find to work. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 11 Look care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 21 Q What does that company do, by the way? 22 A No. 3 Q Is it fair for me to assume that your abuse was not an issue then in your life? 4 No. 3 Q Is it fair for me to assume that your abuse was not an issue then in your life? 4 No. 8 Palmer Coking Coal Company, you had worked for the Kent School District from the time period are you referring to? 4 MR. KOSNOFF: Form of the question. Which time period are you referring to? 5 MR. KOSNOFF: Well, there were two distinct time periods. 6 (By Mr. Frey) From when you first saw her with regard to the relationship the break up of your relationship with your partner up until sometime and I can get the exact date; we'll confirm the date but I think the first entry is sometime in June of perhaps 2002, but I'll confirm that. 15 A It the first 16 Q You saw her on two separate occasions starting in '97, did you not? 18 A In '97, I went to see her regarding some relationship issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your documents, how long I saw her. And then I did not return to her until 2003. And that's when I returned to her in regard to the abuse.	١,	0	And that is where in Black Diamond?	1	0	during that time period, at least?
3 Q How long had you worked for them? 4 A 14 months, approximately. 5 Q Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? 6 the Kent School District, hadn't you? 7 A Yes. 8 Q What is your current capacity with the Kent School 9 District? 10 A I'm a custodian. 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 14 A Because it is the least stressful place I could find to work. 15 Q Were you dismissed or fired from the Palmer Company? 16 A No. 17 Q What was your job there? 18 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 3 Q Is it fair for me to assume that your abuse was not an issue then in your life? 4 MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. FREY: From 1997 until MR. KOSNOFF: Well, there were two distinct time periods. 10 Q (By Mr. Frey) From when you first saw her with regard to the relationship the break up of your relationship with your partner up until sometime and I can get the exact date; we'll confirm the date but I think the first entry is sometime in June of perhaps 2002, but I'll confirm that. 15 A It the first You saw her on two separate occasions starting in '97, did you not? 18 A In '97, I went to see her regarding some relationship issues. 20 Q Right. 21 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 22 Q What does that company do, by the way? 23 A I took care of accounts receivable, collections customer to her until 2003. And that's when I returned to her in regard to the to talk to her in regard to the abuse.	ı			2		-
4 A 14 months, approximately. 5 Q Before the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? 6 the Kent School District, hadn't you? 7 A Yes. 8 Q What is your current capacity with the Kent School 9 District? 10 A I'm a custodian. 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the Palmer Coking Company, whatever it is? 14 A Because it is the least stressful place I could find to work. 15 Q Were you dismissed or fired from the Palmer Company? 16 A Box and ends around that needed to be fixed around the company. 16 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 4 issue then in your life? MR. KOSNOFF: Form of the question. Which time period are you referring to? MR. KOSNOFF: Well, there were two distinct time periods. 10 Q (By Mr. Frey) From when you first saw her with regard to the relationship the break up of your relationship with your partner up until sometime and I can get the exact date; we'll confirm the date but I think the first entry is sometime in June of perhaps 2002, but I'll confirm that. 11 L the first 12 You saw her on two separate occasions starting in '97, did you not? 13 A In '97, I went to see her regarding some relationship issues. 24 Q What does that company do, by the way? 25 A I can't tell you; however, you probably have it in your documents, how long I saw her. And then I did not return to her until 2003. And that's when I returned to her in regard to the to talk to her in regard to the abuse.	ı				Q	Is it fair for me to assume that your abuse was not an
Segment the Palmer Coking Coal Company, you had worked for the Kent School District, hadn't you? 7 A Yes. 8 What is your current capacity with the Kent School 9 District? 10 A I'm a custodian. 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? 16 A Because it is the least stressful place I could find to work. 17 Work. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 5 MR. KOSNOFF: Form of the question. Which time period are you referring to? 6 MR. KOSNOFF: Well, there were two distinct time periods. 10 Q (By Mr. Frey) From when you first saw her with regard to the relationship the break up of your relationship with your partner up until sometime and I can get the exact date; we'll confirm the date but I think the first entry is sometime in June of perhaps 2002, but I'll confirm that. 12 A It the first 16 Q You saw her on two separate occasions starting in '97, did you not? 18 A In '97, I went to see her regarding some relationship issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your documents, how long I saw her. And then I did not return to her until 2003. And that's when I returned to her in regard to the abuse.	ı			4	-	
time period are you referring to? The Kent School District, hadn't you? Yes. What is your current capacity with the Kent School District? Results a custodian. In a custodian. Why did you go back to the Kent School District from the Palmer Coking Coal Company, or Coal Coking Company, whatever it is? Results a Because it is the least stressful place I could find to work. Results a Palmer Coking What was your job there? Results a Palmer Coking Coal Company or Coal Coking Company? What was your job there? Results a Palmer Coking Coal Company or Coal Coking Company? Results a Palmer Company or Coal Coking Company? Results a Palmer Company or Coal Coking Company. Results a Palme	I			5		MR. KOSNOFF: Form of the question. Which
7 MR. FREY: From 1997 until 8 What is your current capacity with the Kent School 9 District? 10 A I'm a custodian. 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the 14 Palmer Coking Coal Company, or Coal Coking Company, 15 whatever it is? 16 A Because it is the least stressful place I could find to 17 work. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer 22 service, order entry, running the scale house, fixed odds 23 and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 7 MR. FREY: From 1997 until 8 MR. KOSNOFF: Well, there were two distinct 10 Q (By Mr. Frey) From when you first saw her with regard to 11 time periods. 10 Q (By Mr. Frey) From when you first saw her with regard to 11 the relationship the break up of your relationship with your relationship in the capture of the relationship of your relationship in the capture of the relationship in the clate but I think the first entry is sometime in June of perhaps 2002, but I'll confirm that. 15 A It the first 16 Q You saw her on two separate occasions starting in '97, did you not? 18 A In '97, I went to see her regarding some relationship issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your documents, how long I saw her. And then I did not return to her until 2003. And that's when I returned to her in regard to the to talk to her in regard to the abuse.	1	•		6		
8 What is your current capacity with the Kent School 9 District? 10 A I'm a custodian. 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the 14 Palmer Coking Coal Company, or Coal Coking Company, 15 whatever it is? 16 A Because it is the least stressful place I could find to 17 work. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer 22 service, order entry, running the scale house, fixed odds 23 and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 8 MR. KOSNOFF: Well, there were two distinct time periods. 10 Q (By Mr. Frey) From when you first saw her with regard to the relationship the break up of your relationship with your relationship with your relationship with the relationship the break up of your relationship with your partner up until sometime and I can get the exact date; we'll confirm the date but I think the first entry is sometime in June of perhaps 2002, but I'll confirm that. 15 A It the first 16 Q You saw her on two separate occasions starting in '97, did you not? 18 A In '97, I went to see her regarding some relationship issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your documents, how long I saw her. And then I did not return to her until 2003. And that's when I returned to her in regard to the abuse.	1	Α		7		
9 District? 10 A I'm a custodian. 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the 14 Palmer Coking Coal Company, or Coal Coking Company, 15 whatever it is? 16 A Because it is the least stressful place I could find to 17 work. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer 22 service, order entry, running the scale house, fixed odds 23 and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 9 time periods. 10 Q (By Mr. Frey) From when you first saw her with regard to the relationship the break up of your relationship with the relationship the break up of your relationship with your partner up until sometime and I can get the exact date; we'll confirm the date but I think the first entry is sometime in June of perhaps 2002, but I'll confirm that. 15 A It the first 16 Q You saw her on two separate occasions starting in '97, did you not? 18 A In '97, I went to see her regarding some relationship issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your documents, how long I saw her. And then I did not return to her until 2003. And that's when I returned to her in regard to the to talk to her in regard to the abuse.		Q	What is your current capacity with the Kent School	8		MR. KOSNOFF: Well, there were two distinct
10 A I'm a custodian. 11 Q You were a custodian before, were you not? 12 A Yes. 13 Q Why did you go back to the Kent School District from the 14 Palmer Coking Coal Company, or Coal Coking Company, 15 whatever it is? 16 A Because it is the least stressful place I could find to 17 work. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer 22 service, order entry, running the scale house, fixed odds 23 and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 10 Q (By Mr. Frey) From when you first saw her with regard to 11 the relationship the break up of your relationship with 12 your partner up until sometime and I can get the exact 13 date; we'll confirm the date but I think the first entry 14 is sometime in June of perhaps 2002, but I'll confirm that. 15 A It the first 16 Q You saw her on two separate occasions starting in '97, did 17 you not? 18 A In '97, I went to see her regarding some relationship 19 issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your 22 documents, how long I saw her. And then I did not return 23 to her until 2003. And that's when I returned to her in 24 regard to the to talk to her in regard to the abuse.	1			9		
12 A Yes. 13 Q Why did you go back to the Kent School District from the 14 Palmer Coking Coal Company, or Coal Coking Company, 15 whatever it is? 16 A Because it is the least stressful place I could find to 17 work. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer 22 service, order entry, running the scale house, fixed odds 23 and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 12 your partner up until sometime and I can get the exact date; we'll confirm the date but I think the first entry is sometime in June of perhaps 2002, but I'll confirm that. 16 A It the first 16 Q You saw her on two separate occasions starting in '97, did 17 you not? 18 A In '97, I went to see her regarding some relationship issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your documents, how long I saw her. And then I did not return to her until 2003. And that's when I returned to her in regard to the to talk to her in regard to the abuse.	10	Α	I'm a custodian.	10	Q	
13 Q Why did you go back to the Kent School District from the 14 Palmer Coking Coal Company, or Coal Coking Company, 15 whatever it is? 16 A Because it is the least stressful place I could find to 17 work. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer 22 service, order entry, running the scale house, fixed odds 23 and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 13 date; we'll confirm the date but I think the first entry 14 is sometime in June of perhaps 2002, but I'll confirm that. 15 A It the first 16 Q You saw her on two separate occasions starting in '97, did 17 you not? 18 A In '97, I went to see her regarding some relationship 19 issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your 22 documents, how long I saw her. And then I did not return 23 to her until 2003. And that's when I returned to her in 24 regard to the to talk to her in regard to the abuse.	11	Q	You were a custodian before, were you not?	1		
Palmer Coking Coal Company, or Coal Coking Company, whatever it is? A Because it is the least stressful place I could find to work. Were you dismissed or fired from the Palmer Company? A No. What was your job there? A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. What does that company do, by the way? Palmer Coking Coal Company, or Coal Coking Company, is sometime in June of perhaps 2002, but I'll confirm that. It the first If Q You saw her on two separate occasions starting in '97, did you not? In '97, I went to see her regarding some relationship issues. Q Right. I can't tell you; however, you probably have it in your documents, how long I saw her. And then I did not return to her until 2003. And that's when I returned to her in regard to the to talk to her in regard to the abuse.	12	A		ł		your partner up until sometime and I can get the exact
15 whatever it is? 16 A Because it is the least stressful place I could find to 17 work. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer 22 service, order entry, running the scale house, fixed odds 23 and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 15 A It the first 16 Q You saw her on two separate occasions starting in '97, did 17 you not? 18 A In '97, I went to see her regarding some relationship 19 issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your 22 documents, how long I saw her. And then I did not return 23 to her until 2003. And that's when I returned to her in 24 regard to the to talk to her in regard to the abuse.	13	Q	Why did you go back to the Kent School District from the	ŧ		
16 A Because it is the least stressful place I could find to 17 work. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer 22 service, order entry, running the scale house, fixed odds 23 and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 16 Q You saw her on two separate occasions starting in '97, did 17 you not? 18 A In '97, I went to see her regarding some relationship 19 issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your 22 documents, how long I saw her. And then I did not return 23 to her until 2003. And that's when I returned to her in 24 regard to the to talk to her in regard to the abuse.	14			£		
work. 18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 17 you not? 18 A In '97, I went to see her regarding some relationship issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your documents, how long I saw her. And then I did not return to her until 2003. And that's when I returned to her in regard to the to talk to her in regard to the abuse.	15			1		
18 Q Were you dismissed or fired from the Palmer Company? 19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 18 A In '97, I went to see her regarding some relationship issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your documents, how long I saw her. And then I did not return to her until 2003. And that's when I returned to her in regard to the to talk to her in regard to the abuse.		Α		l .	Q	
19 A No. 20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer 22 service, order entry, running the scale house, fixed odds 23 and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 19 issues. 20 Q Right. 21 A I can't tell you; however, you probably have it in your 22 documents, how long I saw her. And then I did not return 23 to her until 2003. And that's when I returned to her in 24 regard to the to talk to her in regard to the abuse.						
20 Q What was your job there? 21 A I took care of accounts receivable, collections, customer 22 service, order entry, running the scale house, fixed odds 23 and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 20 Q Right. 21 A I can't tell you; however, you probably have it in your 22 documents, how long I saw her. And then I did not return 23 to her until 2003. And that's when I returned to her in 24 regard to the to talk to her in regard to the abuse.	1				Α	· · · · · · · · · · · · · · · · · · ·
21 A I took care of accounts receivable, collections, customer 22 service, order entry, running the scale house, fixed odds 23 and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 21 A I can't tell you; however, you probably have it in your 22 documents, how long I saw her. And then I did not return 23 to her until 2003. And that's when I returned to her in 24 regard to the to talk to her in regard to the abuse.	1				^	
service, order entry, running the scale house, fixed odds and ends around that needed to be fixed around the company. What does that company do, by the way? 22 documents, how long I saw her. And then I did not return to her until 2003. And that's when I returned to her in regard to the to talk to her in regard to the abuse.	1			1		
23 and ends around that needed to be fixed around the company. 24 Q What does that company do, by the way? 23 to her until 2003. And that's when I returned to her in regard to the to talk to her in regard to the abuse.	i	Α		1	A	
24 Q What does that company do, by the way? 24 regard to the to talk to her in regard to the abuse.	1		service, order entry, running the scale house, fixed odds	i		
1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		_				
23 A RS a milit - graver mining operation.				1	0	And did you return to her in 2003 after you had made the
	23	А	it 5 a titule graver tituling operation.	Ĺ	~	

Page 32 Page 30 telling me that you forgot about the abuse, or are you decision to commence this litigation and to retain counsel, 1 1 2 telling me that you had put the abuse behind you during pursue a claim against the church? 2 3 this period? I don't believe so. 3 Α Is it fair for me to assume, then, when you first saw her I don't think you could ever forget about the abuse. I 4 Α 4 Q knew the abuse happened. But it was something that I had in 1997, and for the period following that initial visit 5 5 during 1997 and 1998, the records reflect that you never 6 6 And then, when you were going through your difficulties 7 Q discussed with her anything to do with your -- with the 7 with -- was the break-up with your partner the reason you 8 problems with abuse? 8 9 went to see Linda Herman? 9 Α I believe that's true. Can I assume from that that you did not -- you were not 10 Α Yes. 10 Q And she was -- you were referred to her by what, your 11 experiencing any problems with the abuse or the aftermath 11 physician, or how did you get to see her? 12 of that? 12 I don't recall who referred me. 13 Correct. 13 Α But the purpose you went to see him was because of the fact 14 O You were functioning, as far as you knew, without having 14 0 that you had split with your partner and he had left 15 any impact on your life of the abuse which you claim now 15 permanently and this was a matter of real distress to you 16 that Jack Loholt -- and I'm not saying that it didn't 16 at the time; is that correct? 17 happen, but the claims against Jack Loholt; is that 17 That's correct. 18 Α correct? Let me rephrase the question. 18 And for the record, am I correct that this was a homosexual 19 19 Α Thank you. or gay relationship that you had with this partner; is that 20 Up until -- and the records reflect, by the way, that you 20 Q started seeing her in October of '97, and that that went on 21 right? 21 through '98, '99 -- pardon me. From '97 through '98, and 22 Α Yes. 22 23 0 What, if you can tell me, was the reason that you went back then you did not go back to see her until February of 2003. 23 to see Linda Herman in 2003 after your last visit, which So from '98 to 2003, there is a gap. Am I correct in 24 24 25 according to the records I have, was in March of 1998? assuming that when you saw her in '97 and '98, that during 25 Page 33 Page 31 I went back because I thought I was going to lose myself. that time period, you weren't having any difficulties with 1 Α 1 dealing with the aftermath of the abuse, or the effects of You thought you were going to lose yourself? Why did you 2 2 3 feel that way? the abuse by Jack Loholt; is that correct? 3 I was feeling stressed, overwhelmed, unsure of things, 4 Α MR. KOSNOFF: Objection. To the extent it 4 insecure. I felt like a mess, and I didn't know why. 5 calls for an expert opinion, we would object. 5 Had you talked with an attorney about suing the church 6 MR. FREY: I'm just asking him about his 6 prior to your going to see Linda Herman again in 2003? 7 7 feelings. I believe I talked to an attorney after I went to see 8 Α (By Mr. Frey) Is that correct? 8 0 9 Linda, several months after. I was functioning to what I felt was normal. 9 Α If the records from Linda Herman indicate that when she saw 10 Q And prior to seeing Linda Herman, am I correct in assuming Q 10 11 you in February -- February 11, 2003, that you had gone to that you felt that you were not suffering the after effects 11 an attorney prior to seeing her, would you think she made 12 or the impact of this abuse from the time you quit seeing 12 an erroneous entry or do you think she could be correct --13 Mr. Denison until you went to see Ms. Herman? Is that 13 MR. KOSNOFF: Objection. 14 14 correct? In other words, there's another period in your (By Mr. Frey) - that you had seen an attorney before you 15 15 life when you didn't see any counselors; is that correct, went to see her? from the time you quit seeing Mr. Denison until you went to 16 16 MR. KOSNOFF: Objection to the form of the see Ms. Herman? 17 17 18 auestion. 18 That's correct. Α During that time period in your life, is it fair to state 19 Q (By Mr. Frey) Go ahead. You may answer. 19 Q 20 Α I don't believe that I spoke with an attorney until several that you didn't feel you were impacted or affected enough 20 months after I saw her. in any way by this abuse to have to seek some sort of help? 21 21 What caused, in your mind, what caused your feelings about 22 The abuse was not anything I was thinking about at the 22 Α the abuse to come to the foreground where you felt you 23 23 time. I was functioning as normal as I could. It wasn't 24 needed the help of Linda Herman? anything I was dwelling on. 24 I have no idea how they came up. They just did. 25 A Let me kind of explore a point here with you. Are you 25 Q

		Page 42			Page 44
1	Α	I was living in Provo with some roommates.	1		meaning Palmer?
2	Q	Can you tell me the names of those roommates?	2	Α	Because I did other things outside of their office. They
3	Ā	Dan Brown, Troy Christiansen, that's all I can recall.	3		had rental homes, and I'd go tend to the rental homes, fix
4		There were others but I don't recall who they were.	4		a door that's broken or so I got extra money.
5	Q	And did you have a job while you were going to court	5	Q	Is that because you've had experience doing remodeling and
6		reporting school?	6		carpentry and other type of construction work?
7	Α	I don't believe so.	7	Α	I've had experience on my own doing that, yes.
8	Q	How did you support yourself?	8	Q	Are the benefits as far as health insurance, retirement and
9	À	I had a grant, and I had saved up some money.	9		so forth, better or less beneficial with the school
10	Q	What kind of a grant did you have?	10		district than they are with Palmer?
11	À	A PELL Grant.	11	A	I believe they would be comparable. I've not written them
12	Q	A PELL Grant?	12		down and looked at them side by side.
13	Α	Yes.	13	Q	Who was your supervisor or your boss at Palmer?
14	Q	For the record, what kind of grant is that?	14	A	Bill Kombol, K-O-M-B-O-L.
15	Α	I'm not exactly sure, other than the government gives you	15	Q	And how did did you know him before you went to work for
16		money to help you with your schooling. I don't know if	16		the company?
17		that's an acronym for something, I'm not sure.	17	A	No.
18	Q	And did you complete your court reporting training?	18	Q	Is he a member of the Mormon Church?
19	Α	No.	19	Α	No.
20	Q	Following that, what did you do?	20	Q	Is he the one who hired you?
21	Α	I believe after that, I came back home.	21	A	Yes.
22	Q	Is that when you worked for Iddings, Inc. in Kent, a loader	22	Q	I want to turn for a moment to talk a little bit about the
23		operator?	23		abuse from Mr. Jack Loholt. And in your answers to
24	Α	I believe it is.	24		interrogatories, you state, quote, "The sexual abuse I endured by Jack Loholt/Onefrey," O-N-E-F-R-E-Y, "started
25	Q	So as I understand it, from an educational standpoint, you	25		endured by Jack Lonon/Oneney, O-N-E-1-R-E-1, Staffed
\vdash		Page 43			Page 45
١,		have a high school degree, you graduated from high school?	1		when I was about 12 years old, just after being baptized in
1		Yes.	2		LDS church in 1972, and when I transferred from the locally
3	A Q	You did not receive any type of certificate of completion	3		run Boy Scout troop to the LDS Church Scout troop, and
4	V	or anything from Utah Tech; is that correct?	4		continued until I was 17, or when Jack fled to Canada." Is
5	Α	Correct.	5		that an accurate statement?
6	Q	And the court reporting school that you went to, you didn't	6	Α	Yes.
7	Ų	complete that so you're not qualified to engage in that	7	Q	Can you tell me the first instance of abuse that you
8		profession; is that correct?	8		remember with Jack Loholt?
9	Α	Correct.	9	Α	The first instance that I recall was being on a camp out.
10	Q	Have you taken any other types of classes or training to	10	Q	Was being on a camp out?
11	~	try to gain any skills? For instance, an apprentice	11	Α	A Boy Scout camp out, and having to sleep with him, and him
12		electrician or anything of that nature where you go and	12		touching me.
13		actually enroll in some sort of a program with a union or	13	Q	This would have been when you were about 12 years old; is
14		some other trade organization to try to learn a skill or	14		that correct?
15	Α	No.	15	Α	I believe so.
16	Q	Is the income you make as a janitor with Kent School	16	Q	And you slept with him. Is this because your sleeping bag
17	•	District more or less than you were making with Palmer Coal	17		was wet or something like that, or what was the
18		and Coke Company?	18		circumstance that you ended up sleeping with him?
19	Α	Palmer Coking Coal.	19	Α	
20	Q	Okay, Coking Coal.	20	Q	But on the first occasion, why were you
21	A	No, it's quite a bit less.	21	Α	But on this occasion it's because that's where he told me I
22	Q	By quite a bit less, how much less is it?	22		was sleeping.
	À	In dollars per hour, five. In an additional benefit that I	23	Q	Were there other boys with you at the time?
3		•	101		There were other boys on the camp out, but I was the only
23 24		got from them, another two-twenty.	24	Α	
23	Q	got from them, another two-twenty. What was the additional benefit that you got from them,	25	A	one that was sleeping with him.

		Page 46			Page 48
1	Q	Were you in a separate tent from the other boys, or a	1		at the other location the Allenbachs lived at, I don't
2		separate room, or where were you?	2		recall anything happening there.
3	A	I don't recall.	3	Q	Were you aware that Jack Loholt lived on the Allenbach
4	Q	After that instance, can you remember the next time that	4		property for a while?
5		you were abused by Jack Loholt?	5	Α	Yes.
6	Α	I can't remember every instance.	6	Q	How did you become aware of that?
7	Q	I understand that.	7	À	I guess just the boys just knew that, that he lived there
8	A	I just remember there were many.	8		at the Allenbachs'.
9	Q	Can you give me some notion when you say many, about how	9	Q	What boys?
10	V	many times you were touched or abused by him?	10	Α	The Boy Scouts.
11	Α	I would say every time we went on a camping Scout trip,	11	Q	When you first joined the Boy Scouts, did you know whether
12	2%	every time we were at his house working on a merit badge or	12		or not he was living on the Allenbach property at the time,
13		spending the night, every time I went and worked for him,	13		or was he living at the other home on 256th?
14		every time.	14	A	I don't know.
15	Q	Okay.	15	Q	Do you believe that Dr. Allenbach knew that Jack Loholt was
16	A	And occasionally in the church.	16		abusing some of the Scouts?
17	Q	When did it happen in the church?	17	Α	Do I believe that?
18	A	We would have Boy Scout meetings in the church. I remember	18	Q	Yes.
19		the room.	19	Α	I would find it hard to believe if he didn't know it.
20	Q	Okay.	20	Q	Is that a yes or a no? I mean, I'm asking for your
21	A	When I would need to go use the restroom.	21		personal belief, I'm not saying it's a fact. But do you
22	Q	When you what? Needed to go to the restroom?	22		believe that Dr. Allenbach knew?
23	A	(Witness nods.)	23	Α	
24	Q	He would follow you in there?	24	Q	And why do you believe that?
25	A	He would show up in there.	25	Α	I believe that he was wrapped up with him financially to
<u> </u>		D . 47			Page 49
		Page 47	,		where it would have been a loss for him had he made it
1	Q	Okay. And he abused you, then, in the restroom?	1		known.
2	A	Yes.	2 3	O	
3	Q	Where did Jack Loholt live, as you remember it?	4	Ų	the abuse that Jack Loholt was engaging in with these young
4	Α	He lived on the corner of 256th and 140th, approximately	5		Scouts?
5		140th.	! .	Α	
6	Q	How far was that from your family home?	6 7	Q	Are you aware that Jimmy Allenbach has stated under oath
7	A	At one point, it was probably five miles. We moved, and it	8	Ų	that he told his father about the abuse?
8		was approximately a half a mile.	1	٨	The state of the s
9	Q	How old were you when you moved to where you were a half a	9 10	Α	recall he did say that to me.
10		mile from his house, if you can tell me?	11	Q	
1			1 1 1		THE TOR HER CONTOLOGICATION WHITE THE TRANSPORTER AND THE
11	A	An early teenager.	1	~	
12	A Q	To your knowledge, were you aware that any other boys were	12		lawsuit?
12 13		To your knowledge, were you aware that any other boys were involved with Jack Loholt in a sexual fashion during the	12 13	A	lawsuit? Yes.
12 13 14	Q	To your knowledge, were you aware that any other boys were involved with Jack Loholt in a sexual fashion during the time that you were being abused?	12 13 14	A Q	lawsuit? Yes. On how many occasions have you talked with him?
12 13 14 15		To your knowledge, were you aware that any other boys were involved with Jack Loholt in a sexual fashion during the time that you were being abused? During the time that I was being abused, no. However,	12 13 14 15	A Q A	lawsuit? Yes. On how many occasions have you talked with him? We have talked three or four times.
12 13 14 15 16	Q	To your knowledge, were you aware that any other boys were involved with Jack Loholt in a sexual fashion during the time that you were being abused? During the time that I was being abused, no. However, there was one instance when I do recall another Scout in	12 13 14 15 16	A Q A Q	lawsuit? Yes. On how many occasions have you talked with him? We have talked three or four times. Was it prior to you filing the lawsuit?
12 13 14 15 16 17	Q A	To your knowledge, were you aware that any other boys were involved with Jack Loholt in a sexual fashion during the time that you were being abused? During the time that I was being abused, no. However, there was one instance when I do recall another Scout in the room.	12 13 14 15 16 17	A Q A Q A	lawsuit? Yes. On how many occasions have you talked with him? We have talked three or four times. Was it prior to you filing the lawsuit? No.
12 13 14 15 16 17 18	Q A Q	To your knowledge, were you aware that any other boys were involved with Jack Loholt in a sexual fashion during the time that you were being abused? During the time that I was being abused, no. However, there was one instance when I do recall another Scout in the room. When you were being abused?	12 13 14 15 16 17 18	A Q A Q A	lawsuit? Yes. On how many occasions have you talked with him? We have talked three or four times. Was it prior to you filing the lawsuit? No. After the lawsuit was filed?
12 13 14 15 16 17 18 19	Q A Q A	To your knowledge, were you aware that any other boys were involved with Jack Loholt in a sexual fashion during the time that you were being abused? During the time that I was being abused, no. However, there was one instance when I do recall another Scout in the room. When you were being abused? Yes.	12 13 14 15 16 17 18 19	A Q A Q A Q A	lawsuit? Yes. On how many occasions have you talked with him? We have talked three or four times. Was it prior to you filing the lawsuit? No. After the lawsuit was filed? Yes.
12 13 14 15 16 17 18 19 20	Q A Q A Q	To your knowledge, were you aware that any other boys were involved with Jack Loholt in a sexual fashion during the time that you were being abused? During the time that I was being abused, no. However, there was one instance when I do recall another Scout in the room. When you were being abused? Yes. Who was that other Scout?	12 13 14 15 16 17 18 19 20	A Q A Q A	lawsuit? Yes. On how many occasions have you talked with him? We have talked three or four times. Was it prior to you filing the lawsuit? No. After the lawsuit was filed? Yes. Have you discussed with Jimmy Allenbach or any other
12 13 14 15 16 17 18 19 20 21	Q A Q A	To your knowledge, were you aware that any other boys were involved with Jack Loholt in a sexual fashion during the time that you were being abused? During the time that I was being abused, no. However, there was one instance when I do recall another Scout in the room. When you were being abused? Yes. Who was that other Scout? That was Jim Allenbach.	12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A	lawsuit? Yes. On how many occasions have you talked with him? We have talked three or four times. Was it prior to you filing the lawsuit? No. After the lawsuit was filed? Yes. Have you discussed with Jimmy Allenbach or any other person, except attorneys, any other lay person, suing the
12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q	To your knowledge, were you aware that any other boys were involved with Jack Loholt in a sexual fashion during the time that you were being abused? During the time that I was being abused, no. However, there was one instance when I do recall another Scout in the room. When you were being abused? Yes. Who was that other Scout? That was Jim Allenbach. Were you ever abused on any property or buildings owned by	12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A	lawsuit? Yes. On how many occasions have you talked with him? We have talked three or four times. Was it prior to you filing the lawsuit? No. After the lawsuit was filed? Yes. Have you discussed with Jimmy Allenbach or any other person, except attorneys, any other lay person, suing the Allenbach estate for the damages that you sustained at the
12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q	To your knowledge, were you aware that any other boys were involved with Jack Loholt in a sexual fashion during the time that you were being abused? During the time that I was being abused, no. However, there was one instance when I do recall another Scout in the room. When you were being abused? Yes. Who was that other Scout? That was Jim Allenbach. Were you ever abused on any property or buildings owned by the the Allenbach family?	12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A	lawsuit? Yes. On how many occasions have you talked with him? We have talked three or four times. Was it prior to you filing the lawsuit? No. After the lawsuit was filed? Yes. Have you discussed with Jimmy Allenbach or any other person, except attorneys, any other lay person, suing the Allenbach estate for the damages that you sustained at the hands of Jack Loholt?
12 13 14 15 16 17 18 19 20 21 22	Q A Q A	To your knowledge, were you aware that any other boys were involved with Jack Loholt in a sexual fashion during the time that you were being abused? During the time that I was being abused, no. However, there was one instance when I do recall another Scout in the room. When you were being abused? Yes. Who was that other Scout? That was Jim Allenbach. Were you ever abused on any property or buildings owned by the the Allenbach family?	12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A	lawsuit? Yes. On how many occasions have you talked with him? We have talked three or four times. Was it prior to you filing the lawsuit? No. After the lawsuit was filed? Yes. Have you discussed with Jimmy Allenbach or any other person, except attorneys, any other lay person, suing the Allenbach estate for the damages that you sustained at the hands of Jack Loholt? Have I discussed it with anyone else?

		Page 50			Page 52
,			1		school.
1		anyone else? Jim Allenbach and Rick Allenbach.	2	Q	At the time that you sustained abuse at the hands of Jack
	A	And what is your belief would be the basis for your suing	3		Loholt that was one of my earlier questions was he
	Q	the Allenbach estate?	4		living on 256th or was he living at the Allenbach
4		MR. KOSNOFF: Objection, mischaracterizes his	5		residence?
5		*	6	Α	I don't recall when he moved to 256th.
6		testimony.	7	o	Did you ever visit Jack Loholt at his home on 256th where
	Q	(By Mr. Frey) Go ahead. You can answer.	8	-	you voluntarily walked over to see him?
	A	I felt he was negligent.	9	Α	I don't recall ever doing that.
	Q	In what way? If it's true that he knew, he should have said something.	10	Q	Am I correct in my assumption — and that's the reason for
	A		11		that first question that any time you were abused, it
	Q	Have you talked to Mrs. Kelly?	12		was in conjunction with your being with Mr. Loholt in some
12		MR. KOSNOFF: Objection, form. When? Where?	13		sort of a Scouting function, or am I wrong in that?
13	_	MR. FREY: Objection is noted.	14	Α	It was in the form of a Scouting function and/or I was
	Q	(By Mr. Frey) Have you talked with Mrs. Kelly about this	15	71	employed by him.
15		lawsuit?	16	O	Now, you were employed by him when you were, what, 17 years
	A	We have spoke on the phone.	17	Ų	old?
	Q	When did you speak with her?	18	Α	16, 17.
	A	It's been months ago.	19	Q	And I'm trying to understand, when you're 16 or 17 years
	Q	Was it after you filed the lawsuit?	ŧ	V	old I assume this abuse was offensive to you from the
	A	By filing the lawsuit, do you mean that	20		time it started up until the time it ceased; is that
	Q	I mean when it was commenced. When the lawsuit was	21		correct?
22		formally filed, and the lawsuit was commenced, that is, the	22		
23		filing of a complaint and so forth.	23	A	Yes. And I'm trying to understand, when you're 16 or 17 years
24		MR. KOSNOFF: Objection. Do you know the	24	Q	old, why would you continue to work or be near him if he
25		date that the lawsuit was filed?	25		old, why would you continue to work of be near little ne
		Page 51			Page 53
1		THE WITNESS: No.	1		was abusing you when that occurred?
2 (Q	(By Mr. Frey) Let's go back, and we can get the date of	2	Α	
3	`	the lawsuit, but did you talk with her in preparation of	3		be asked to a woman that's being beaten by her husband, why
4		filing the lawsuit, to get information from her? For the	4		did you stay? I didn't know how to get away from it.
5		record it was October 25, 2004 the lawsuit was filed.	5	Q	Were you living at home at the time?
i	Α	I don't recall when I spoke with her, was it before, or if	i		
		I ([III] FELAH WHEH I Spoke with her, was it boroso, or in	6	Α	
7			6 7	A Q	Did you have to pay room and board or anything while you
7		it was after.	1		
8 (Q	it was after. And what did you talk to her about?	7		Did you have to pay room and board or anything while you
8 9 9	Q A	it was after. And what did you talk to her about? I didn't talk to her about anything that any details of	7 8		Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat?
8 9 9 ,	Q A	it was after. And what did you talk to her about? I didn't talk to her about anything that any details of what happened to me. In fact, I didn't call her or	7 8 9	Q	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board.
8 9 10 11	Q A	it was after. And what did you talk to her about? I didn't talk to her about anything that any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with	7 8 9 10	Q A	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board.
8 9 10 11 12	Q A	it was after. And what did you talk to her about? I didn't talk to her about anything that any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with her boys.	7 8 9 10 11 12	Q A	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board. So they provided you a place to sleep and food on the table, I presume; is that correct?
8 9 10 11 12 13	Q A Q	it was after. And what did you talk to her about? I didn't talk to her about anything that any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with her boys. All right. In what way were you concerned about her boys?	7 8 9 10 11 12 13	Q A Q	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board. So they provided you a place to sleep and food on the table, I presume; is that correct? That's correct.
8 9 10 11 12 13 14 .	Q A Q A	it was after. And what did you talk to her about? I didn't talk to her about anything that any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with her boys. All right. In what way were you concerned about her boys? They were neighbors.	7 8 9 10 11 12 13 14	Q A Q A	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board. So they provided you a place to sleep and food on the table, I presume; is that correct? That's correct. So, when you went to work for Jack Loholt, this was
8 9 10 11 12 13 14 15	Q A Q A Q	it was after. And what did you talk to her about? I didn't talk to her about anything that any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with her boys. All right. In what way were you concerned about her boys? They were neighbors. Pardon me?	7 8 9 10 11 12 13 14 15	Q A Q A	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board. So they provided you a place to sleep and food on the table, I presume; is that correct? That's correct. So, when you went to work for Jack Loholt, this was something that you didn't have to do? Nobody forced you to
8 9 10 11 12 13 14 15 16	Q A Q A Q A	it was after. And what did you talk to her about? I didn't talk to her about anything that any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with her boys. All right. In what way were you concerned about her boys? They were neighbors. Pardon me? They were neighbors. Were they abused.	7 8 9 10 11 12 13 14 15 16	Q A Q A	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board. So they provided you a place to sleep and food on the table, I presume; is that correct? That's correct. So, when you went to work for Jack Loholt, this was something that you didn't have to do? Nobody forced you to go to work for him; you could have worked someplace else;
8 9 10 11 12 13 14 15 16 17	Q A Q A Q A Q	it was after. And what did you talk to her about? I didn't talk to her about anything that — any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with her boys. All right. In what way were you concerned about her boys? They were neighbors. Pardon me? They were neighbors. Were they abused. Neighbors of the Allenbachs?	7 8 9 10 11 12 13 14 15 16 17	Q A Q A	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board. So they provided you a place to sleep and food on the table, I presume; is that correct? That's correct. So, when you went to work for Jack Loholt, this was something that you didn't have to do? Nobody forced you to go to work for him; you could have worked someplace else; is that correct?
8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A	it was after. And what did you talk to her about? I didn't talk to her about anything that — any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with her boys. All right. In what way were you concerned about her boys? They were neighbors. Pardon me? They were neighbors. Were they abused. Neighbors of the Allenbachs? Yes.	7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board. So they provided you a place to sleep and food on the table, I presume; is that correct? That's correct. So, when you went to work for Jack Loholt, this was something that you didn't have to do? Nobody forced you to go to work for him; you could have worked someplace else; is that correct? Actually, I don't believe that is, because I felt trapped
8 9 10 11 12 13 14 15 16 17 18 19	Q A Q A Q A Q	it was after. And what did you talk to her about? I didn't talk to her about anything that — any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with her boys. All right. In what way were you concerned about her boys? They were neighbors. Pardon me? They were neighbors. Were they abused. Neighbors of the Allenbachs? Yes. And why, being neighbors of the Allenbachs, would you think	7 8 9 10 11 12 13 14 15 16 17 18 19	Q A Q A	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board. So they provided you a place to sleep and food on the table, I presume; is that correct? That's correct. So, when you went to work for Jack Loholt, this was something that you didn't have to do? Nobody forced you to go to work for him; you could have worked someplace else; is that correct? Actually, I don't believe that is, because I felt trapped into going to work for Jack Loholt.
8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q A Q A Q	it was after. And what did you talk to her about? I didn't talk to her about anything that — any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with her boys. All right. In what way were you concerned about her boys? They were neighbors. Pardon me? They were neighbors. Were they abused. Neighbors of the Allenbachs? Yes. And why, being neighbors of the Allenbachs, would you think that would put them in a position where they may be abused?	7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q A Q Q	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board. So they provided you a place to sleep and food on the table, I presume; is that correct? That's correct. So, when you went to work for Jack Loholt, this was something that you didn't have to do? Nobody forced you to go to work for him; you could have worked someplace else; is that correct? Actually, I don't believe that is, because I felt trapped into going to work for Jack Loholt. Can you tell me why you felt trapped into working for him?
8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q A Q A Q A Q A Q A	it was after. And what did you talk to her about? I didn't talk to her about anything that — any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with her boys. All right. In what way were you concerned about her boys? They were neighbors. Pardon me? They were neighbors. Were they abused. Neighbors of the Allenbachs? Yes. And why, being neighbors of the Allenbachs, would you think that would put them in a position where they may be abused? Because Jack lived there.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q A Q A	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board. So they provided you a place to sleep and food on the table, I presume; is that correct? That's correct. So, when you went to work for Jack Loholt, this was something that you didn't have to do? Nobody forced you to go to work for him; you could have worked someplace else; is that correct? Actually, I don't believe that is, because I felt trapped into going to work for Jack Loholt. Can you tell me why you felt trapped into working for him? A lot of the parents thought Jack was good for the boys.
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q A Q	it was after. And what did you talk to her about? I didn't talk to her about anything that — any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with her boys. All right. In what way were you concerned about her boys? They were neighbors. Pardon me? They were neighbors. Were they abused. Neighbors of the Allenbachs? Yes. And why, being neighbors of the Allenbachs, would you think that would put them in a position where they may be abused? Because Jack lived there. This is something you learned later?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q Q	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board. So they provided you a place to sleep and food on the table, I presume; is that correct? That's correct. So, when you went to work for Jack Loholt, this was something that you didn't have to do? Nobody forced you to go to work for him; you could have worked someplace else; is that correct? Actually, I don't believe that is, because I felt trapped into going to work for Jack Loholt. Can you tell me why you felt trapped into working for him? A lot of the parents thought Jack was good for the boys. He had a construction company. He built things. He ran
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q A	it was after. And what did you talk to her about? I didn't talk to her about anything that — any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with her boys. All right. In what way were you concerned about her boys? They were neighbors. Pardon me? They were neighbors. Were they abused. Neighbors of the Allenbachs? Yes. And why, being neighbors of the Allenbachs, would you think that would put them in a position where they may be abused? Because Jack lived there. This is something you learned later? That Jack lived there?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q Q	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board. So they provided you a place to sleep and food on the table, I presume; is that correct? That's correct. So, when you went to work for Jack Loholt, this was something that you didn't have to do? Nobody forced you to go to work for him; you could have worked someplace else; is that correct? Actually, I don't believe that is, because I felt trapped into going to work for Jack Loholt. Can you tell me why you felt trapped into working for him? A lot of the parents thought Jack was good for the boys. He had a construction company. He built things. He ran bulldozers and backhoes and dump trucks. And I tried to
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q A Q A Q A Q A Q	it was after. And what did you talk to her about? I didn't talk to her about anything that — any details of what happened to me. In fact, I didn't call her or approach her looking for her. I was more concerned with her boys. All right. In what way were you concerned about her boys? They were neighbors. Pardon me? They were neighbors. Were they abused. Neighbors of the Allenbachs? Yes. And why, being neighbors of the Allenbachs, would you think that would put them in a position where they may be abused? Because Jack lived there. This is something you learned later?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q Q	Did you have to pay room and board or anything while you were living at home when were you 16 and 17, or did your family provide you a place to sleep and eat? I did not pay room and board. So they provided you a place to sleep and food on the table, I presume; is that correct? That's correct. So, when you went to work for Jack Loholt, this was something that you didn't have to do? Nobody forced you to go to work for him; you could have worked someplace else; is that correct? Actually, I don't believe that is, because I felt trapped into going to work for Jack Loholt. Can you tell me why you felt trapped into working for him? A lot of the parents thought Jack was good for the boys. He had a construction company. He built things. He ran

		Page 70			Page 72
1	Q	Why did you tell them?	1	Α	I do not remember ever telling her.
2	A	For the same reason that I told Jim, was to let them know	2	Q	
3		that what I was doing. I didn't know where the	3		telling her about the abuse, and actually crying in front
4		investigation would go so that they wouldn't be	4		of her and telling her about the incidents on the Scout
5		surprised.	5		outings where you'd get your sleeping bag wet and get your
6	Q	Did you seek to have them join your lawsuit?	6		clothes wet so you'd have to sleep with him and go into
7	À	No.	7		that kind of detail with her? You're saying you didn't
8	Q	Did you tell them they could join your lawsuit if they felt	8		ever do that?
9	-	they had been abused?	9	Α	I don't recall ever telling her that.
10	Α	I don't believe I said that.	10	Q	
11	Q	Is there anyone else you can think of at this time, other	11		MR. KOSNOFF: Objection, it's been asked and
12		than the Grosses?	12		answered four times now. Put your next question.
13	Α	I don't recall anyone else at this time.	13		MR. FREY: I don't believe he's answered that
14	Q	Do you know Barbara and Robert Searle?	14		question.
15	Α	Yes.	15	Q	
16	Q	How well do you know them?	16		MR. KOSNOFF: He's answered the question.
17	Α	I haven't seen them in many, many years.	17		Move on. He's not going to answer it a fourth time.
18	Q	How well did you know them growing up?	18		MR. FREY: Are you objecting? The basis of
19	Α	They were good to me.	19		the objection?
20	Q	But how well did you know them?	20		MR. KOSNOFF: I'm objecting because it's now
21	Α	I believe I knew them well.	21		an abusive question. He's answered the question. You've
22	Q	Did you visit their home often?	22		put it three different ways three times. He's denied
23	Α	Yes.	23		recalling having ever made such a statement to her. I'm
24	Q	Was she a confidante of yours, Mrs. Searle, Barbara Searle?	24		going to direct him not to answer any further questions
25	A	I shared things with her.	25		along these lines.
		Page 71			Page 73
l .		Page 71			Page 73
1	Q	Isn't it a fact that you spent a great deal of time	1		MR. FREY: Counsel, are you claiming a
2		Isn't it a fact that you spent a great deal of time confiding in her about various things in your life?	2		MR. FREY: Counsel, are you claiming a privilege? That's the
2 3	Q A	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in	2 3		MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes.
2 3 4		Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited	2 3 4		MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for
2 3 4 5		Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with	2 3 4 5		MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege?
2 3 4 5 6		Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends	2 3 4 5 6		MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is
2 3 4 5 6 7	A	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters.	2 3 4 5 6 7		MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at
2 3 4 5 6 7 8		Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their	2 3 4 5 6 7 8		MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that
2 3 4 5 6 7 8 9	A Q	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you?	2 3 4 5 6 7 8 9		MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him
2 3 4 5 6 7 8 9	A Q A	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes.	2 3 4 5 6 7 8 9	0	MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer.
2 3 4 5 6 7 8 9 10	A Q A Q	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters?	2 3 4 5 6 7 8 9 10	Q	MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If
2 3 4 5 6 7 8 9 10 11 12	A Q A Q A	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters? Yes.	2 3 4 5 6 7 8 9 10 11 12	Q	MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If Mrs. Searle were to say that you, on more than one
2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters? Yes. And you were invited to those by the family?	2 3 4 5 6 7 8 9 10 11 12 13	Q	MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If Mrs. Searle were to say that you, on more than one occasion, were with her, met with her, discussed in detail
2 3 4 5 6 7 8 9 10 11 12 13 14	A Q A Q A Q A	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters? Yes. And you were invited to those by the family? Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14	Q	MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If Mrs. Searle were to say that you, on more than one occasion, were with her, met with her, discussed in detail the fact that you'd been abused by Jack Loholt, and on more
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A Q A Q A Q A Q	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters? Yes. And you were invited to those by the family? Yes. Did you visit their daughters when they were at BYU?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q	MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If Mrs. Searle were to say that you, on more than one occasion, were with her, met with her, discussed in detail the fact that you'd been abused by Jack Loholt, and on more than one of those occasions you even cried, telling her
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A Q A Q A	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters? Yes. And you were invited to those by the family? Yes. Did you visit their daughters when they were at BYU? Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q	MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If Mrs. Searle were to say that you, on more than one occasion, were with her, met with her, discussed in detail the fact that you'd been abused by Jack Loholt, and on more than one of those occasions you even cried, telling her about the story, and that you were upset and distraught
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A Q A Q	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters? Yes. And you were invited to those by the family? Yes. Did you visit their daughters when they were at BYU? Yes. Did you ever disclose to Barbara Searle the facts of your	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q	MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If Mrs. Searle were to say that you, on more than one occasion, were with her, met with her, discussed in detail the fact that you'd been abused by Jack Loholt, and on more than one of those occasions you even cried, telling her about the story, and that you were upset and distraught about it, and that you even told her about Jimmy Allenbach
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A Q A Q	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters? Yes. And you were invited to those by the family? Yes. Did you visit their daughters when they were at BYU? Yes. Did you ever disclose to Barbara Searle the facts of your abuse and how it impacted you?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q	MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If Mrs. Searle were to say that you, on more than one occasion, were with her, met with her, discussed in detail the fact that you'd been abused by Jack Loholt, and on more than one of those occasions you even cried, telling her about the story, and that you were upset and distraught about it, and that you even told her about Jimmy Allenbach being one of his favorites, and told her about Jack hiring
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Q A Q A Q A Q A Q A Q	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters? Yes. And you were invited to those by the family? Yes. Did you visit their daughters when they were at BYU? Yes. Did you ever disclose to Barbara Searle the facts of your abuse and how it impacted you? I don't recall ever doing that.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q	MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If Mrs. Searle were to say that you, on more than one occasion, were with her, met with her, discussed in detail the fact that you'd been abused by Jack Loholt, and on more than one of those occasions you even cried, telling her about the story, and that you were upset and distraught about it, and that you even told her about Jimmy Allenbach being one of his favorites, and told her about Jack hiring you to work for him, and he abused you during that time
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q A Q	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters? Yes. And you were invited to those by the family? Yes. Did you visit their daughters when they were at BYU? Yes. Did you ever disclose to Barbara Searle the facts of your abuse and how it impacted you? I don't recall ever doing that. You have no memory of ever talking to her about it?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20		MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If Mrs. Searle were to say that you, on more than one occasion, were with her, met with her, discussed in detail the fact that you'd been abused by Jack Loholt, and on more than one of those occasions you even cried, telling her about the story, and that you were upset and distraught about it, and that you even told her about Jimmy Allenbach being one of his favorites, and told her about Jack hiring you to work for him, and he abused you during that time period, would you deny that you did that?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A Q A Q A Q A	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters? Yes. And you were invited to those by the family? Yes. Did you visit their daughters when they were at BYU? Yes. Did you ever disclose to Barbara Searle the facts of your abuse and how it impacted you? I don't recall ever doing that. You have no memory of ever talking to her about it? No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A	MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If Mrs. Searle were to say that you, on more than one occasion, were with her, met with her, discussed in detail the fact that you'd been abused by Jack Loholt, and on more than one of those occasions you even cried, telling her about the story, and that you were upset and distraught about it, and that you even told her about Jimmy Allenbach being one of his favorites, and told her about Jack hiring you to work for him, and he abused you during that time period, would you deny that you did that? I don't recall ever talking to her about that.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A Q A Q	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters? Yes. And you were invited to those by the family? Yes. Did you visit their daughters when they were at BYU? Yes. Did you ever disclose to Barbara Searle the facts of your abuse and how it impacted you? I don't recall ever doing that. You have no memory of ever talking to her about it? No. Do you deny that you told her?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22		MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If Mrs. Searle were to say that you, on more than one occasion, were with her, met with her, discussed in detail the fact that you'd been abused by Jack Loholt, and on more than one of those occasions you even cried, telling her about the story, and that you were upset and distraught about it, and that you even told her about Jimmy Allenbach being one of his favorites, and told her about Jack hiring you to work for him, and he abused you during that time period, would you deny that you did that? I don't recall ever talking to her about that. Would you read back the answer?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A Q A Q A	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters? Yes. And you were invited to those by the family? Yes. Did you visit their daughters when they were at BYU? Yes. Did you ever disclose to Barbara Searle the facts of your abuse and how it impacted you? I don't recall ever doing that. You have no memory of ever talking to her about it? No. Do you deny that you told her? I don't recall that I told her.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A	MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If Mrs. Searle were to say that you, on more than one occasion, were with her, met with her, discussed in detail the fact that you'd been abused by Jack Loholt, and on more than one of those occasions you even cried, telling her about the story, and that you were upset and distraught about it, and that you even told her about Jimmy Allenbach being one of his favorites, and told her about Jack hiring you to work for him, and he abused you during that time period, would you deny that you did that? I don't recall ever talking to her about that. Would you read back the answer? (The pending answer was read by the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A Q A Q	Isn't it a fact that you spent a great deal of time confiding in her about various things in your life? I wouldn't say I spent a great deal of time confiding in her. I don't know that I had a lot to confide. I visited with her, because she was a person that visited with everybody. I was at their house, because I was friends—close friends with their daughters. That was my next question. You were close to their daughters, weren't you? Yes. Did you attend any weddings of their daughters? Yes. And you were invited to those by the family? Yes. Did you visit their daughters when they were at BYU? Yes. Did you ever disclose to Barbara Searle the facts of your abuse and how it impacted you? I don't recall ever doing that. You have no memory of ever talking to her about it? No. Do you deny that you told her?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A	MR. FREY: Counsel, are you claiming a privilege? That's the MR. KOSNOFF: Yes. MR. FREY: that's the only basis for instructing him not to answer. What's the privilege? MR. KOSNOFF: The basis of the objection is the repetitive and abusive nature of the questioning at this point. He does not have to submit to questions that are repetitive and abusive in nature. I'm instructing him not to answer. (By Mr. Frey) I'm going to ask you another way, then. If Mrs. Searle were to say that you, on more than one occasion, were with her, met with her, discussed in detail the fact that you'd been abused by Jack Loholt, and on more than one of those occasions you even cried, telling her about the story, and that you were upset and distraught about it, and that you even told her about Jimmy Allenbach being one of his favorites, and told her about Jack hiring you to work for him, and he abused you during that time period, would you deny that you did that? I don't recall ever talking to her about that. Would you read back the answer?

Page 76 Page 74 clear on the record. There's a difference when someone Do you know if Jimmy Allenbach was one of them? 1 Q 1 2 He most likely was. says, "I don't recall," than when a person says, "It didn't Α 2 But you have no memory today of who the other boys were happen, I know it didn't happen." What I'm trying to 3 Q 3 that were there? elicit from you is -- you may not recall it -- what I'm 4 4 5 Α No. trying to elicit from you, are you saying, "It never 5 Do you remember if there was -- how many there were? happened"? "I know it never happened"? "I deny that it 6 0 6 7 Α No. 7 happened"? When you were doing your mission in Chicago, did you 8 0 8 MR. KOSNOFF: Objection, Mr. Frey, I don't befriend a young lady back there during the course of your 9 know how else to make it clear to you. A person cannot 9 make a denial of something he doesn't remember one way or 10 mission? 10 the other. You've now asked it five different times. I'm I met a lot of people. I don't -- no name comes to mind. Α 11 11 12 0 At some point, did you strike up a friendship with a young directing him not to respond to that question any more in 12 lady who was serving a mission in South America? whatever form you put it. If I need to make that objection 13 13 any clearer or any stronger, I will. But you've asked the 14 Α I don't remember anything like that. 14 Do you blame Jack Loholt for any of the damages or injury question now five times. He has no memory of such a 15 Q 15 that you have sustained because of this abuse? 16 conversation with her. 16 MR. KOSNOFF: Objection, form of the 17 (By Mr. Frey) So I'm clear on the record, you have no 17 Q question. memory of ever discussing anything to do with abuse, Jack 18 18 (By Mr. Frey) Go ahead, you may answer. Loholt, or any of the claims that you're making in this 19 Q 19 I think that, because of the abuse, I will never know who I lawsuit, you have no -- you do not recall ever discussing 20 20 that with Barbara Searle or her husband at any time, ever? 21 21 My question is, do you blame or lay any fault on Jack 22 Q 22 I do not recall. Α Do you remember the Searles ever visiting you when you 23 Loholt for the abuse? Q 23 24 MR. KOSNOFF: Objection, form of the lived in Maple Valley? 24 25 question. In what sense? They may have. I had people that came by and visited me. 25 Α

> Page 77 Page 75

I'm not going to say they didn't. 1

- Did you ever have a conversation with Barbara Searle or her 2 Q husband in which you told them that you were gay? 3
- I don't recall. 4 Α
- Did you ever tell Barbara Searle or her husband that you 5 Q
- had had a confrontation with Jack Loholt, telling him, and 6 7 complaining to him about the damage and injury that he had
- caused to you by abusing you? 8
- 9 I don't recall. Α
- Did you ever tell Barbara Searle that you believed you were 10 Q gay because of what Jack Loholt had done to you? 11
- I don't recall. 12 Α
- Did you go to their daughter, Paula's wedding? 13 0
- 14 Α I believe I did.
- Did you have any discussions with Barbara Searle at the 15 Q wedding? 16
- I'm sure I visited with her. 17 Α
- Anything to do with your abuse? 18 Q
- I don't recall. 19 Α
- You mentioned earlier that you had gone to the basement, Q 20
- the apartment basement in Mr. Allenbach's house and made 21
- root beer down there. Was that with Jack Loholt? 22
- 23 Α Yes.
- Q Who was there with you when you did that, if you remember? 24
- There were other boys. I don't know who they were. 25 Α

- 0 (By Mr. Frey) Go ahead. You can answer. 1
- 2 Α
- 3 Q Am I correct in assuming, then, that you feel Jack Loholt 4 did something wrong towards you?
- 5 Α
- Do you feel it was a substantial wrong? Q 6
- 7 Α

11

12

13

14

15

16

17

18

19

20

21

22

23

25

Do you feel that he bears any responsibility for the 8 injuries and damages that you feel you've sustained as a 9 result of this -- of his conduct? 10

> MR. KOSNOFF: Objection. Form of the question, relevance.

MR. FREY: Counsel, the rule provides that you can object on the basis of privilege or the form of the question. That's all.

MR. KOSNOFF: No, that's not entirely true, Tom. In fact, I can object if I believe that the question is improperly phrased; I can object if I believe that it's not relevant, it's not reasonably calculated to lead to the admission of relevant and admissible testimony. I can state an objection for that reason as well.

MR. FREY: Well, we can get the rule at the lunch break, but that isn't the rule.

(By Mr. Frey) I'm going to ask you now, Mr. Fleming --24 MR. KOSNOFF: You're asking him questions

Page 80 Page 78 -Α about legal relevance, about the --1 So in 1979 and 1980, Richard Pettit, when you met with him, 2 MR. FREY: I'm not, Counsel, and stop the 2 told you the church knew about it? speaking objections. We can call the Federal Judge. But 3 3 4 Α 4 I'm not going to put up with it. And that's the conversation you told me about earlier where MR. KOSNOFF: You inquired, Counsel, the 5 O 5 he said they thought they had taken care of the problem; is 6 basis for my objection, and you asserted wrongly that I 6 7 that correct? cannot assert an objection when you're going on a fishing 7 expedition asking him about aspects of his claims, about That's correct. 8 8 Q So you've known since that time, at least in your own mind, which -- he's not an attorney; his opinion about the legal 9 9 that the church had some knowledge, according to aspects of his claim are not relevant to his deposition. 10 10 Mr. Pettit; is that correct? (By Mr. Frey) Mr. Fleming, I'm going to ask you again, and 11 11 0 we can go back -- will you find the question before the 12 A Yes. 12 Q And is there anything else that you're aware of, other than 13 13 colloguy starter. this conversation with Richard Pettit, that makes you 14 (The pending question was read by 14 believe that the church had knowledge or knew something 15 the reporter.) 15 about Jack Loholt's activities with regard to abuse of 16 He was put into a position that he had power and control, 16 children? and that position allowed him to hurt me, and yes, I do 17 17 A There are a few things that I've learned since I filed 18 feel that he harmed me. 18 19 this. And he bears responsibility, in your mind, for the acts 19 Q What have you learned? 20 Q that he committed upon you; is that correct? 20 Through investigation, that things of -- that have come to MR. KOSNOFF: Objection, form of the 21 Α 21 light. When I talked to Rick, let him know what I was 22 22 question. doing, he informed his brother which means that goes back 23 (By Mr. Frey) You may answer. 23 Q farther -- or that his brother was abused, which means it 24 MR. KOSNOFF: It's up to a jury to decide. 24 goes back farther than me. 25 MR. FREY: Counsel. 25 Page 81 Page 79 Okay. Anything else that you're aware of that you believe (By Mr. Frey) You may answer. 1 Q demonstrates the church knew about Jack Loholt and his 2 I believe he is partially responsible. 2 Α activities? 3 You believe he committed a wrong towards you? 3 Q Not that I can recall at this time; however, my 4 Yes, I do. 4 Α acknowledgment by Richard Pettit was enough. I don't need 5 Now, I'm going to ask you, why did you not choose to sue 5 0 to know any more. Mr. Loholt, if that was your decision? If it wasn't your 6 6 At the time that you learned from Richard Pettit the decision, then I don't want to ask what you discussed with 7 7 information that he gave you about -- that you've testified 8 your counsel. 8 to about where you've indicated he told you the church 9 A Because the church put him there. 9 thought they had taken care of that, did that upset you? 10 So as I understand your answer, in your own mind -- I'm not 10 Q talking about legal aspects -- in your own mind, you Yes. 11 Α 11 O Did you express the fact that you were upset or angry with believe it's all the church's fault, and that Mr. Loholt --12 12 Richard Pettit? because they put him there, that Mr. Loholt is not 13 13 I don't recall exactly what I said, but I do remember 14 responsible? 14 thinking this never had to happen to me. A Mr. Loholt bears part of the responsibility, but the church 15 15 Did you feel anger and frustration and some type of did not take action to -- they put him there and they 16 16 betrayal at that point when you learned that information 17 didn't take him out. 17 18 O What is your belief, or understanding, as to what the 18 I would say that I was angry and frustrated, yes. church knew or didn't know about Mr. Loholt? 19 19 Did you feel the church had wronged you? 20 Q When Richard Pettit told me that they knew. It could have 20 Α 21 Yes. Α stopped a long time ago. 21 How old were you then? When did Richard Pettit tell you this? 22 Q 22 Q 17, 18. MR. KOSNOFF: Objection, it's been asked and 23 Α 23 Do you have any notion -- and this may be repetitive, I 24 Q answered. 24 acknowledge that at the beginning -- do you have any notion Q (By Mr. Frey) Go ahead. You can answer. 25 25

1			Τ		
		Page 94	١.		Page 96
l	A				mother?
2	Q		2	Α	That relationship was real short, six months, maybe. I
3	A	*	3		don't remember much about that relationship. I think it
4	Q		4		was a rebound relationship for my mother. She was in it
5	A	I don't know. I was in Scouting.	5	^	and she was out of it. I don't recall much about it.
6	Q	· · · · · · · · · · · · · · · · · · ·	6	Q	
7	A	I don't know.	7	Α	No, I don't know why they separated.
8	Q		8	Q	You don't recall any arguments or physical abuse at all
9	A	While I was in the church?	9		going on during that time period?
10	Q		10	Α	Not that I can recall.
11	Α	There may have been leaders with him, but I recall he was	11	Q	How about Mr. Ron Nash, your I guess he'd be your
12		present my whole Scouting experience, as far as I can	12		stepfather still, wouldn't he?
13		recall. When he was the Assistant Scout Master, the Head	13	A	No.
14	_	Master, I don't recall.	14	Q	Pardon?
15	Q		15	A	No, he's not.
16		remember any other person that you were involved with,	16	Q	I mean, he would have been at the time?
17		other than Jack Loholt, as either an Assistant Scout Master	17	A	He would have been, yes. He's not currently.
18		or as a Scout Master?	18	Q	How was the relationship between Ron Nash and your mother?
19	A	There was involved with Scouting while I was in Scouting?	19	Α	They seemed to get along good for long periods, and then
20	Q		20	_	they would argue, and they would get along good.
21	Α	I believe that Ken Keller was involved in Scouting, and I	21	Q	Do you remember his being physically violent towards your
22		believe that last name Hoffman rings a bell. I can't	22		mother on any occasions?
23	_	think of a first name.	23	Α	I can't picture in my mind him or her beating on each
24	Q		24	^	other, but I did hear arguments.
25	Α	He was in the ward. I don't recall if he was in the	25	Q	How would you describe their relationship?
		Page 95			Page 97
1		Scouts.	1	A	Controlling by Ron Nash.
	Q		1 2		Controlling by Ron Nash. Do you ever recall your mother going to the bishop and
2	Q	Was all of your contact in all of your Scouting activities,		A Q	Do you ever recall your mother going to the bishop and
	Q		2		
2	Q A	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with?	2 3		Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the
2 3 4		Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom	2 3 4	Q	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash?
2 3 4 5		Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that	2 3 4 5	Q	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was
2 3 4 5 6		Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the	2 3 4 5 6	Q A	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him.
2 3 4 5 6 7	A	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything.	2 3 4 5 6 7	Q A Q	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me?
2 3 4 5 6 7 8	A	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and	2 3 4 5 6 7 8	Q A Q A	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him.
2 3 4 5 6 7 8 9	A Q	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board?	2 3 4 5 6 7 8 9	Q A Q A	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home
2 3 4 5 6 7 8 9	A Q A	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know.	2 3 4 5 6 7 8 9	Q A Q A Q	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period?
2 3 4 5 6 7 8 9 10	A Q A	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know. Do you have any memory of being in Scouting activities when	2 3 4 5 6 7 8 9 10	Q A Q A Q	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period? No.
2 3 4 5 6 7 8 9 10 11	A Q A Q	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know. Do you have any memory of being in Scouting activities when you were 16 and 17? I can't answer that, honestly tell you if that was the	2 3 4 5 6 7 8 9 10 11	Q A Q A Q	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period? No. Nevertheless, did you know about how that relationship has progressed?
2 3 4 5 6 7 8 9 10 11 12 13 14	A Q A Q	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know. Do you have any memory of being in Scouting activities when you were 16 and 17? I can't answer that, honestly tell you if that was the case. 16, 17 I don't recall.	2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q A A	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period? No. Nevertheless, did you know about how that relationship has
2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q A	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know. Do you have any memory of being in Scouting activities when you were 16 and 17? I can't answer that, honestly tell you if that was the case. 16, 17 I don't recall. In your employment you're talking about 1978 and 1979	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period? No. Nevertheless, did you know about how that relationship has progressed? They've been married for many years. I think they—Pardon me?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know. Do you have any memory of being in Scouting activities when you were 16 and 17? I can't answer that, honestly tell you if that was the case. 16, 17 I don't recall. In your employment you're talking about 1978 and 1979 you worked for Jack Loholt. That would have been when you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A Q A	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period? No. Nevertheless, did you know about how that relationship has progressed? They've been married for many years. I think they Pardon me? I think they get along pretty good.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know. Do you have any memory of being in Scouting activities when you were 16 and 17? I can't answer that, honestly tell you if that was the case. 16, 17 I don't recall. In your employment you're talking about 1978 and 1979 you worked for Jack Loholt. That would have been when you were 16 and 17 years old. Were you in a Scouting movement	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q A Q A Q A Q	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period? No. Nevertheless, did you know about how that relationship has progressed? They've been married for many years. I think they Pardon me? I think they get along pretty good. When you first started being abused by Mr. Loholt, I think
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know. Do you have any memory of being in Scouting activities when you were 16 and 17? I can't answer that, honestly tell you if that was the case. 16, 17 I don't recall. In your employment you're talking about 1978 and 1979 you worked for Jack Loholt. That would have been when you were 16 and 17 years old. Were you in a Scouting movement then with the church?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period? No. Nevertheless, did you know about how that relationship has progressed? They've been married for many years. I think they Pardon me? I think they get along pretty good. When you first started being abused by Mr. Loholt, I think you indicated earlier that it didn't start with the more
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Q A Q A Q	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know. Do you have any memory of being in Scouting activities when you were 16 and 17? I can't answer that, honestly tell you if that was the case. 16, 17 I don't recall. In your employment you're talking about 1978 and 1979 you worked for Jack Loholt. That would have been when you were 16 and 17 years old. Were you in a Scouting movement then with the church? I don't know. I was at his home. I worked for him. I	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q A Q A Q A	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period? No. Nevertheless, did you know about how that relationship has progressed? They've been married for many years. I think they Pardon me? I think they get along pretty good. When you first started being abused by Mr. Loholt, I think you indicated earlier that it didn't start with the more physical type of abuse, which you've described for us, but
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A A	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know. Do you have any memory of being in Scouting activities when you were 16 and 17? I can't answer that, honestly tell you if that was the case. 16, 17 I don't recall. In your employment you're talking about 1978 and 1979 you worked for Jack Loholt. That would have been when you were 16 and 17 years old. Were you in a Scouting movement then with the church? I don't know. I was at his home. I worked for him. I don't know if I was still going on Scouting events.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q A Q A	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period? No. Nevertheless, did you know about how that relationship has progressed? They've been married for many years. I think they Pardon me? I think they get along pretty good. When you first started being abused by Mr. Loholt, I think you indicated earlier that it didn't start with the more physical type of abuse, which you've described for us, but it worked up to that at some point. When the abuse how
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know. Do you have any memory of being in Scouting activities when you were 16 and 17? I can't answer that, honestly tell you if that was the case. 16, 17 I don't recall. In your employment you're talking about 1978 and 1979 you worked for Jack Loholt. That would have been when you were 16 and 17 years old. Were you in a Scouting movement then with the church? I don't know. I was at his home. I worked for him. I don't know if I was still going on Scouting events. I want to go back for a moment to a little bit about your	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q A Q A Q A	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period? No. Nevertheless, did you know about how that relationship has progressed? They've been married for many years. I think they Pardon me? I think they get along pretty good. When you first started being abused by Mr. Loholt, I think you indicated earlier that it didn't start with the more physical type of abuse, which you've described for us, but it worked up to that at some point. When the abuse how soon was it after you got into Scouting that the abuse
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A A	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know. Do you have any memory of being in Scouting activities when you were 16 and 17? I can't answer that, honestly tell you if that was the case. 16, 17 I don't recall. In your employment you're talking about 1978 and 1979 you worked for Jack Loholt. That would have been when you were 16 and 17 years old. Were you in a Scouting movement then with the church? I don't know. I was at his home. I worked for him. I don't know if I was still going on Scouting events. I want to go back for a moment to a little bit about your family circumstance. When you we talked about the abuse	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q A Q	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period? No. Nevertheless, did you know about how that relationship has progressed? They've been married for many years. I think they Pardon me? I think they get along pretty good. When you first started being abused by Mr. Loholt, I think you indicated earlier that it didn't start with the more physical type of abuse, which you've described for us, but it worked up to that at some point. When the abuse how soon was it after you got into Scouting that the abuse started?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A A	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know. Do you have any memory of being in Scouting activities when you were 16 and 17? I can't answer that, honestly tell you if that was the case. 16, 17 I don't recall. In your employment you're talking about 1978 and 1979 you worked for Jack Loholt. That would have been when you were 16 and 17 years old. Were you in a Scouting movement then with the church? I don't know. I was at his home. I worked for him. I don't know if I was still going on Scouting events. I want to go back for a moment to a little bit about your family circumstance. When you we talked about the abuse that you recalled involving your biological father. When	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period? No. Nevertheless, did you know about how that relationship has progressed? They've been married for many years. I think they Pardon me? I think they get along pretty good. When you first started being abused by Mr. Loholt, I think you indicated earlier that it didn't start with the more physical type of abuse, which you've described for us, but it worked up to that at some point. When the abuse how soon was it after you got into Scouting that the abuse started? I believe it was my first camping trip with them, with the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A A	Was all of your contact in all of your Scouting activities, then, with Jack Loholt as the principal person with whom you dealt and worked with? He was the principal person that it appeared to me that way, that worked with the boys all the time. He was the one that was at everything. Was he working with the older boys, 16, 17 year olds, and the 12 year olds, all across the board? I don't know. Do you have any memory of being in Scouting activities when you were 16 and 17? I can't answer that, honestly tell you if that was the case. 16, 17 I don't recall. In your employment you're talking about 1978 and 1979 you worked for Jack Loholt. That would have been when you were 16 and 17 years old. Were you in a Scouting movement then with the church? I don't know. I was at his home. I worked for him. I don't know if I was still going on Scouting events. I want to go back for a moment to a little bit about your family circumstance. When you we talked about the abuse	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q A Q	Do you ever recall your mother going to the bishop and telling you she went to the bishop to complain about the way she was being treated by Ron Nash? I know she went and talked to somebody. I know she was informed to stay with him. Pardon me? I know she was encouraged to stay with him. How about the relationship with Mr. Land? Were you at home during that time period? No. Nevertheless, did you know about how that relationship has progressed? They've been married for many years. I think they Pardon me? I think they get along pretty good. When you first started being abused by Mr. Loholt, I think you indicated earlier that it didn't start with the more physical type of abuse, which you've described for us, but it worked up to that at some point. When the abuse how soon was it after you got into Scouting that the abuse started?

	······································				
		Page 98			Page 100
1		to sleep in his sleeping bag, or told you to?	1	Q	
2	Α		2	1	use the term, more aggressive than that?
3		sleeping with me."	3	A	
4	Q	· ·	4		times were more aggressive. It seemed like it just
5		troop or whatever?	5		progressed to be
6	Α		6	Q	
7	Q	•	7	-	was was it at virtually every Scout meeting that
8	٠	occur, where he would attempt to touch you in some way	8		something happened? Not at first, but as it progressed?
9		or	9	A	• •
10	Α	Like I said earlier, I recall at nearly every Scouting	10		progressed, it just got more and more frequent.
11		event I was at.	11	Q	
12	Q		12		it? How did you feel about it?
13	A	I think they were one day during the week.	13	Α	•
14	Q	Is that what they called mutual? Would they occur during	14		little heart out to somehow somebody make it stop. I laid
15		the mutual?	15		there as a frightened boy.
16	Α	,	16	Q	And afterwards, when it stopped, and you were able to get
17		yeah, mutual.	17		out of there, how did you feel about what had happened?
18	Q		18	Α	, , , , , , , , , , , , , , , , , , , ,
19	A	Mm-hmm.	19		don't anything sexual is bad. It was sexual. To me it
20	Q		20	_	was bad. I felt guilty about it.
21	Α	Some of them took place there; some of them took place at	21	Q	· · · · · · · · · · · · · · · · · · ·
22	~	his house.	22	Α	
23	Q		23	_	and yet he was doing this to me. I mean
24		the church? When I say the church, I'm talking about the	24	Q	, ,
25		ward building.	25		make relationships with other people because of this?
		Page 99			Page 101
1	A	Ţ.	1	4	·
1 2	Α	It seemed like we were at his house a lot, because we would do things at his house.	1 2	Α	Yes. Did you feel that you were confused and you were kind of
3	Q	-	2 3	Q	Did you feel that you were confused and you were kind of losing your direction with your life, or where you were
4	A	· ·	4		going, or what was happening in any way?
5	Q	And did this abuse that occurred to you occur in front of	5	Α	When I was a young boy and it was happening, I didn't know
6	ν.	those Scouts or with those Scouts present?	6	Λ	how to control it. Was I confused? Sure. I didn't know
7	Α	Some of it, but it would be subtle to where it was a touch,	7		what was happening. I didn't know how it stop it. I
8	* ~	a push, a help up the ladder with his hand between your	8		the only path that I knew was to stay as involved in the
9		legs.	9		church as I could, because even though I felt being there
10	Q	When did it move to this more, for lack of a better term,	10		was hurting me, not being there I was afraid.
11	•	aggressive or physical type of contact?	11	Q	Did you feel lost?
12	Α		12	Ă	I felt lost.
13		camping trips, we would go to his home. And if he had	I	Q	And when it got to the point where you were working with
14		occasion where we were sleeping over somewhere, that's	14		him, you said you felt you couldn't leave?
15		where it would be more aggressive.	15	Α	Correct.
16	Q	Did the type of conduct involving masturbation,		Q	What was the reason for that? What were the feelings that
17	_	ejaculation, the laying on top of you and taking off of	17	-	you had at that point that you felt you couldn't leave him?
18		your clothes, that type of conduct, did that that didn't	18	Α	I felt trapped. He had expressed to my mother, I have an
19			19		opportunity for your son. If I would have left his
20	A	-	20		employment, how could I explain it to my mother? And so I
21	Q	3	21		felt like I was stuck there, because I didn't want people
22	Α		22		to know. I was embarrassed about what had happened and
					~ · · · · · · · · · · · · · · · · · · ·

felt guilty about it. I didn't want them to know.

24 Q Did you feel kind of isolated because of this?

Yes. I thought I was the only one.

23

25 A

23

24

25

something in the -- his field, and I may have to go to his

house with him for something, and for a short period of

time, something would happen.

		Page 126		Page 128
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	A Q A Q A Q A Q A Q A Q A Q A Q A Q A Q	41.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Fleming. The time now is approximately 3:18 p.m., going off the record. (At 3:18 p.m. the proceedings were adjourned.) (Signature was reserved.)
1 2 3 4 5 6 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25		Page 127 he moved in and became a partner with you? Maybe six, eight months. And has that been a continuous relationship since then? Yes. You obtain your health insurance through him; is that correct, or not? That is correct. Was Tony Ashworth your prior partner? Yes. And where is he now; do you know? He lives in Kent. Asworth? Is that right? A-S-W-O-R-T-H? I believe it's A-S-H-W-O-R-T-H. Have you do you see him? Have you seen him from time to time? Yes. And what's your relationship like with him? Friend. Does he have a new partner now? No. I don't think I have any other questions. Thank you very much. MR. KOSNOFF: No questions. THE VIDEOGRAPHER: This is the end of videotape No. 3. This concludes the deposition of Kenneth	1 2 3 4 5 6 7 8 9 100 111 112 113 114 115 116 117 118 119 20 21 22 23 24 25	CERTIFICATE STATE OF WASHINGTON)) ss. COUNTY OF KING) I, Alison Lott, Notary Public in and for the State of Washington, do hereby certify: That the annexed and foregoing deposition was taken stenographically by me and reduced to typewriting under my direction; I further certify that I am in no way related to any party to the cause of action concerned, nor to any of counsel, nor do I have a financial interest in the event of the cause; I further certify that the deposition as transcribed is a full, true and correct transcript of the proceedings; IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal this 24th day of July, 2005. Notary Public in and for the State of Washington, residing at Edmonds. My Commission expires 1/15/07.